

Office of the State Superintendent  
of Education (OSSE), Washington, DC

OSSE FEDERAL GRANT TOOLKIT

# **Consolidated Federal Program Guidance 2014-2015**



OSSE Federal Grant Toolkit: Consolidated Federal Program Guidance  
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Washington, District of Columbia

This material, and all examples are provided only to illustrate how ED funds can be coordinated and should not be used in lieu of federal law. OSSE is not mandating any particular strategy, or endorsing one strategy over another.

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# CONTACT INFORMATION

For questions about the Enterprise Grants Management System (EGMS), please visit: <http://osse.dc.gov/service/enterprise-grants-management-system-egms> or contact the OSSE Help Desk at: [osse.callcenter@dc.gov](mailto:osse.callcenter@dc.gov) or (202) 719-6500.

For general information, contact the Office of Grants Management and Compliance at: [osse.grantscompliance@dc.gov](mailto:osse.grantscompliance@dc.gov).

For specific information on program guidance, please contact:

Consolidated Application: [con.app@dc.gov](mailto:con.app@dc.gov) or [osse.grantscompliance@dc.gov](mailto:osse.grantscompliance@dc.gov).

IDEA: [osse.dse-partbfinance@dc.gov](mailto:osse.dse-partbfinance@dc.gov).

Carl D. Perkins: [cte.osse@dc.gov](mailto:cte.osse@dc.gov) or visit: [osse.dc.gov/career-and-technical-education-cte](http://osse.dc.gov/career-and-technical-education-cte).

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# INTRODUCTION TO PROGRAM GUIDANCE

As the District of Columbia's state educational agency, federal law requires the Office of the State Superintendent of Education (OSSE) to ensure federal money is spent responsibly and effectively. Therefore, OSSE developed this guidance to help DC's local education agencies (LEAs), schools, and other recipients of federal grant funds understand how they may spend the money they receive and the systems they must have in place to manage their programs properly.

This is important because federal law presents LEAs and schools with many options for spending program funds to improve student achievement. Often, program funds can be used in ways LEAs and schools may not be aware of, but maximizing these spending options requires:

- ▶ A robust understanding of federal spending rules, and
- ▶ Strong management systems.

To that end, this guidance includes questions and answers on the:

- ▶ Coordination of spending federal education program funds;
- ▶ Important spending rules that apply to federal education grants;
- ▶ The documentation required to support salaries paid for with federal grants; and
- ▶ The systems, financial management, inventory, etc., and related documentation required to appropriately track and spend federal education dollars.

Part I of this guidance provides information specific to DC's programs, specifically Title I, Part A, Title II, Part A, Title III, Part A of the Elementary and Secondary Education Act (ESEA). Part II provides information specific to IDEA Part B, and Part III provides information specific to programs under Carl D. Perkins grants.

The Appendix of this document provides some examples of how LEAs can coordinate spending of federal education funds to support comprehensive initiatives.

Questions about this guidance should be directed to Office of Grants Management and Compliance.

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# FREQUENTLY ASKED QUESTIONS

While each U.S. Department of Education (ED) grant has its own purpose and rules, OSSE encourages recipients to think about ways to coordinate grants to support comprehensive activities to maximize the impact of federal funds.

For example, a local education agencies (LEAs) might use a combination of Title I, Title II, Title III, and IDEA, Part B funds to provide professional development for teachers on effective interventions for struggling readers.

This type of coordinated approach requires recipients to plan for activities across federal funding streams, which can be challenging, but is encouraged by OSSE and permitted by law.

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## A1. Is coordinated grant spending permitted by federal law?

Yes, federal law authorizes recipients to coordinate spending from different grants as long as the recipient:

- ▶ Follows the federal spending rules discussed throughout Consolidated Federal Program Guidance; and
- ▶ Tracks how federal funds are spent.

Using multiple funding sources to support a project does not mean the funds must be combined together or consolidated from an accounting perspective. Instead, coordinated spending can be thought of as a different way to approach federal funds and begins with robust planning.

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## A2. How can an LEA approach the coordinated spending of federal education grant dollars?

Rather than programming federal funds by individual funding stream, coordinated spending starts with coordinated planning based on student need, and then a coordinated determination of which federal funding sources can support those needs. This approach often results in LEAs realizing that more than one federal funding source (and sometimes state/local sources) can be used to support an initiative, which can result in a more significant impact on students. One way to approach this work is as follows:

- ▶ **Step 1:** Identify the comprehensive activity the school wants to implement that will have a positive impact on students.
  - This step helps the school/LEA prioritize its needs and determine which staff needs to be involved in the decision making process (such as academic, fiscal/grants staff, teachers, etc.).
- ▶ **Step 2:** Identify the component costs of the activity.
  - A comprehensive activity is made up of various component costs. ED grants may be able to support certain costs, but not others. By getting specific early in the planning stages about the component costs, schools/LEAs can have a clearer understanding of the federal resources available to support the overall activity.
- ▶ **Step 3:** Make a preliminary determination about which ED grants can support the various component costs. Federal funding streams are designed for specific purposes and can only support certain types of activities, depending on the rules of the program. For example, federal programs contain:
  - **Eligibility requirements:** Most grants have specific eligibility criteria defining the student or school population that can be served by the program. Costs may only support activities benefiting the populations identified in the law.
  - **Permissible grant activities:** Many grants have a “use of funds” section in the statute that outlines the types of costs that can, and in some cases must, be paid with grant funds. Some grants, such as Title I, Part A, do not have a specific use of funds section. In that case, activities must be consistent with the goals of the program.
  - **Caps:** Some grants permit certain costs to be charged, but only up to a cap. Costs that exceed the cap are not permitted.
  - **Mandatory set-asides:** Some grants require funds to be spent on specific costs or require a designated percentage of funds to be spent on specific activities.

- **Fiscal rules:** All federal education programs have fiscal rules that impact spending choices such as supplement, not supplant, maintenance of effort, and comparability. It is important to note that a rule with the same name, such as “supplement not supplant,” may work differently in different programs.

The requirements above need to be taken into account when determining if a specific ED grant can support a specific cost. Please see the Appendix for more information about individual federal grant program requirements.

- ▶ **Step 4:** Once an ED grant is identified as a potential funding source for a component cost, determine if the cost is “necessary and reasonable” and will benefit the federal program. Among other requirements, any cost charged to federal programs must be necessary for the performance or administration of the program. The cost must also be reasonable in light of the amount of money being spent and the needs of the school/LEA. In practice, this means that a school/LEA should be able to:
  - Justify the cost (including being able to show the amount paid constitutes a fair market value, and that the school/LEA followed relevant procurement rules); and
  - Explain why the cost helps the federal program (in this case, how the cost connects to a larger comprehensive activity to address school/LEA needs and furthers federal program goals).

See Consolidated Federal Program Guidance for more information about federal grants management requirements.

- ▶ **Step 5:** Ensure that the cost is consistent with the LEA’s grant applications and program plans.
  - Schools/LEAs also need to ensure that costs are consistent with the applications they submit to OSSE, for example the Consolidated Application for ESEA funds. If necessary, the LEA may wish to amend its application if it believes a certain type of activity or cost not reflected in the initial application will be more effective for students.

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### **A3. Can OSSE provide examples of how federal education funds can be coordinated to support a comprehensive activity?**

Yes. Please see the Appendix for examples of comprehensive activities a school could support with multiple ED grants. Each example lists a strategy for improving student outcomes, and then identifies activities a school could pay for with ED grants to support that strategy. Just because an activity is listed does not mean it is can always be supported with ED funds. Similarly, just because an activity is not listed does not mean it could not be supported with ED funds. The summaries below are meant only as framework to guide school and LEA thinking about how multiple funding streams could be coordinated to support a comprehensive activity. Ultimately, whether an activity could be paid for with ED funds will depend on a school or LEA’s facts and circumstances.

## **B. SIGNIFICANT SPENDING RULES THAT IMPACT FEDERAL PROGRAMS: FEDERAL COST PRINCIPLES AND SUPPLEMENT, NOT SUPPLANT**

There are several important spending rules that apply to Consolidated Application programs and impact how program funds may be spent. This section will briefly address the “federal cost principles” and “supplement not supplant” requirements. These rules are complex, and misunderstandings about how they apply can limit the reach of Consolidated Application programs. At the same time, failure to comply with these requirements can jeopardize future grant spending or even result in a request for repayment of federal funds.

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### **B1. What are the “federal cost principles” and why do they matter?**

The “federal cost principles” are a set of rules that apply to all federal grants, including U.S. Department of Education (ED) grants. Among other topics, these cost principles address:

- ▶ Costs that may never be paid with federal funds; and
- ▶ General guidelines for all costs paid with federal funds.

The cost principles are developed by the federal the Executive Office of the President, Office of Management and Budget (OMB) and are currently contained in a document called OMB Circular A-87, which is available at: [http://www.whitehouse.gov/omb/circulars\\_a087\\_2004](http://www.whitehouse.gov/omb/circulars_a087_2004).

LEAs must comply with the cost principles, and OSSE is responsible for overseeing compliance in the Consolidated Application programs.

Recently, OMB revised the cost principles, and consolidated them with other administrative rules for federal grant programs. These revisions, which in practice will not take effect until 2015, have been published in a document called Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, sometimes referred to as the “omnicircular” or “supercircular”, available at: <https://www.federalregister.gov/articles/2013/02/01/2013-02113/reform-of-federal-policies-relating-to-grants-and-cooperative-agreements-cost-principles-and>. ED is currently reviewing OMB’s revisions, and is expected to release its own regulations based on OMB’s changes by the end of 2014. Until then, LEAs should continue to follow current law.

OSSE will update this guidance as necessary to reflect ED’s regulations and interpretations of the omnicircular when they are made available.

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## B2. Are there costs that may never be paid for with federal funds?

Yes, there are several kinds of costs that can never be supported with federal funds such as:

- ▶ Alcoholic beverages;
- ▶ Bad debts;
- ▶ Entertainment costs (note: costs that could appear to be entertainment, such as field trips or positive school culture activities, do not run afoul of this prohibition if they have an educational purpose);
- ▶ Fines and penalties;
- ▶ Fundraising and investment management costs (with limited exceptions);
- ▶ General government expenses;
- ▶ Goods or services for personal use; and
- ▶ Lobbying.

ED regulations list additional costs that may not be charged to ED grants, including costs related to:

- ▶ Religion;
- ▶ The acquisition of real property (unless specifically permitted by the grant statute or regulations which is rare in federal education programs);
- ▶ Construction (unless specifically permitted by the grant statute or regulations, which is rare in federal education programs); and
- ▶ Charging tuition or fees collected from students toward meeting matching, cost sharing, or maintenance of effort requirements of a program.

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## B3. What standards must all costs paid for with federal funds meet?

All costs charged to federal funds must, among other things, be:

- ▶ **Necessary and reasonable** for the performance of the grant. It should be clear to an objective observer why a decision to spend funds is a good idea considering the amount of money being spent, the needs of the program, and other relevant circumstances. The LEA should also follow sound business practices, pay a fair market price for the good or service, and act with prudence under the circumstances.
- ▶ **Allocable** to the federal grant that paid for the cost. This means that a grant must benefit from the cost in proportion to the amount paid by the grant. LEAs must be able to account for items purchased with federal funds in order to demonstrate they are being used for federal program purposes, and must be able to link those items to specific costs paid with federal funds. Similarly, LEAs must be able to demonstrate that salary and benefit costs supported with federal funds benefit the federal program in proportion to the amount paid.
- ▶ **Adequately documented** by maintaining sufficient evidence to walk an auditor or monitor through all phases of the grant process. The documentation should be sufficient so that an objective observer can understand the decision to spend funds on a given cost and can trace how the funds were spent.



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## B4. What is "supplement not supplant" and how does it work?

Supplement not supplant is a requirement that applies to most federal education programs including the three programs included in the Consolidated Application: Title I, Title II, and Title III. The policy goal of supplement not supplant is to make sure federal grants provide "extra" support, and do not replace the state and local money recipients would otherwise spend on education.

For background, auditors traditionally presume supplanting has occurred in three situations (sometimes referred to as "the three presumptions of supplanting") when:

1. An LEA or school uses federal funds to provide services the LEA or school is required to make available under other federal, state, or local laws.
2. An LEA or school uses federal funds to provide services the LEA or school provided with state or local funds in the prior year.
3. An LEA or school uses Title I, Part A or Migrant Education Program funds to provide the same services to Title I or migrant students that the LEA or school provides with state or local funds to nonparticipating students.

However, the supplement not supplant requirement operates differently within different programs and sometimes differently within the same program. For example:

- ▶ **The three presumptions do not apply to Title I schools operating schoolwide programs.** Instead, an alternate "supplemental funds" test applies, which is discussed more in Part I. As a result, schools operating schoolwide programs can more easily coordinate spending and Title I funds, along with other funds, can support comprehensive initiatives consistent with the school's needs. This could include initiatives such as improving the curriculum, a 9th grade academy, or school climate initiatives. (It is important to note that the three presumptions do apply to LEA-level Title I spending, and school-level spending in Title I targeted assistance schools.)
- ▶ **The three presumptions do not apply to IDEA, Part B.** Although Part B funds are governed by a supplement not supplant provision, compliance is not tested through the three presumptions. Instead, ED's Office of Special Education Programs has advised that any LEA that meets local maintenance of effort requirements will satisfy supplement not supplant as well.
- ▶ **The third presumption normally does not apply to ESEA programs outside of Title I or the Migrant Education Program (MEP).** For example, the third presumption does not apply to Title II, Part A, meaning an LEA could use a combination of Title II, Part A and state/local funds to support a districtwide initiative to improve teacher quality as long as the initiative is not mandated by state/local law.

Knowing how supplement not supplant operates in a specific federal program can help LEAs and schools make appropriate spending decisions. Part I provides more information about how supplement not supplant applies in individual grants.

## C. DOCUMENTATION REQUIRED TO SUPPORT SALARIES AND BENEFITS PAID FOR WITH FEDERAL FUNDS

All costs charged to federal funds must be adequately documented. As a practical matter, documentation should be sufficient so that an objective observer can understand the decision to spend funds and can trace how the funds were spent.

In the context of salaries and benefits paid for with federal funds, LEAs are required to keep "time and effort" records demonstrating how an employee paid with federal funds worked.

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### C1. What are "time and effort" records and what kinds of employees need to keep such records?

The federal government, under OMB Circular A-87, requires that any employee paid with federal funds must certify he or she actually worked on the programs that supported his or her salary or benefits. These records, known as "time and effort records" must be maintained in order for LEAs to charge personnel costs to federal grants.

The purpose of time and effort records is to verify that employees whose salaries are charged to federal funds performed work consistent with the intent of the program. This helps ensure federal grant funds are used to pay only their appropriate and proportionate share of personnel costs.

**Please refer to OSSE Time and Effort Policy**, found at: <http://osse.dc.gov/service/grants-administration-policy-and-guidance>

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## C2. How often does a staff member need to fill out a time and effort record?

A staff member paid with federal funds has to prepare either monthly or semi-annual records depending on the number of “cost objectives” the employee works on.

Employees that work on a “single cost objective” may sign simplified certifications every six months (semi-annually), while employees that work on “multiple cost objectives” must sign more detailed certifications at least monthly.

The following chart illustrates how often time and effort records must be completed:

Type of Work Performed by the Employee	Time and Effort Record Timing Requirement
Work on a Single Cost Objective	Semi-annual certification
Work on Multiple Cost Objectives	Monthly “Personnel Activity Report” (PAR)

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## C3. What is a single cost objective?

A single cost objective can mean either **working on a single federal program**, or **working on a single activity that is permissible under multiple funding sources**. Here are three examples of a single cost objective:

### Example 1: Employee Working for Only One Federal Program

A teacher working exclusively with Title I eligible students in a targeted assistance school is working on a single cost objective, which would be the “Title I, Part A Program.”

### Example 2: Employee Working on Single Activity that is Permitted under More than One Federal Program and Paid for with More than One Program

An employee that is working on professional development activities that are permissible under two different federal programs (for example, Title I, Part A and Title II, Part A) would constitute a single cost objective. In this case, an LEA may choose to allocate the employee’s entire salary to one of the funding sources (such as Title I, Part A), or may choose to split the employee’s salary among the two funding sources (such as Title I, Part A and Title II, Part A). Either way, the LEA may treat the professional development activities as a single cost objective, in which case the records would reflect the time spent on the substantive activity, for example “professional development” not on a particular federal program.

### Example 3: Employee Working on Single Activity Paid for With Federal and Non-Federal Funds

In this example, an employee that works as a special education teacher is paid 75% with IDEA, Part B funds and 25% with state/local funds. Either funding source could pay for 100% of the teacher’s salary even though the LEA has chosen to split these costs between federal and non-federal funds (perhaps because it does not have enough IDEA funds to support the entire cost of the teacher’s salary). This scenario would constitute a single cost objective, for example “special education instruction.”

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## C4. What is a semi-annual certification?

An employee that works 100% on a single federal cost objective must keep a semi-annual certification. The semi-annual certification must:

- ▶ Be prepared every six months;
- ▶ Be signed after-the-fact by the employee or by a supervisor who has first-hand knowledge of how the employee worked; and
- ▶ Certify that the employee spent 100% of his or her time on a particular cost objective.

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### **C5. What are multiple cost objectives?**

An employee is considered to work on multiple cost objectives when the full cost of the activities the employee performs cannot be charged to any one funding source. For example, a teacher that spends 50% of her time with Title I students in a targeted assistance school, and 50% of her time delivering special education services to special education students, would be considered to work on multiple cost objectives (assuming the special education services could not also be supported with Title I). This is because 100% of her time could not be charged in full to either the Title I program or the IDEA program in a targeted assistance school, rather her time would have to be split to reflect the eligible student populations she worked with.

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### **C6. What is a Personnel Activity Report?**

Where an employee works on multiple cost objectives, the employee must complete a monthly Personnel Activity Report (PAR). Under federal requirements, a PAR must:

- ▶ Be prepared at least monthly and coincide with one or more pay periods;
- ▶ Be signed after-the-fact by the employee; and
- ▶ Account for the employee's total activity.

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### **C7. What must an LEA do to make sure its payroll charges align with time and effort records?**

Under federal rules, LEAs must periodically reconcile payroll charges to the time and effort reflected in employee time and effort records. If the LEA identifies a variance, the LEA must adjust its payroll charges so the amount charged to federal funds reflects the employee's actual time and effort. The LEA may perform this adjustment annually if the variances are less than 10%. The LEA must perform the adjustment at least quarterly if variances are 10% or more.

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### **C8. Is there any flexibility available in the context of keeping time and effort records?**

Yes, LEAs that have an approved "substitute system" can track time and effort through alternate means for personnel working on multiple cost objectives. For example, staff that work under a consistent schedule (such as teachers or other instructional staff) may be able to certify their time and effort through their schedules, as opposed to a separate PAR. Please note this is just one example.

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### **C9. Are there any changes to time and effort requirements that LEAs should anticipate in the future?**

Yes, the federal government is in the process of revising time and effort requirements. The Office of Management and Budget (OMB) recently released a new Circular that significantly changes time and effort reporting requirements and may result in increased flexibility if LEAs have robust payroll and human resources systems that can generate certain records. The U.S. Department of Education will issue new regulations based on OMB's changes. Until the new rules go into effect, LEAs should follow current law as described above. OSSE will update this section to reflect the U.S. Department of Education's new requirements when they are made available.

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## **D. SYSTEMS AND CONTROLS REQUIRED TO BE IN PLACE TO PROPERLY MANAGE FEDERAL GRANT FUNDS**

As stewards of taxpayer money, LEAs have an important responsibility to protect the integrity of federal funds. The systems and processes required to meet this responsibility are sometimes called "internal controls."

Having strong internal controls throughout the grant process is a way to maximize program performance and minimize the risk of federal funds being spent inappropriately. A good system of internal controls should cover a broad range of activities throughout the lifecycle of the grant. Activities in three areas are particularly important to minimize risk to federal funds:

- ▶ **Procurement**, which refers to the systems and controls needed to ensure goods and services purchased with federal funds are delivered by competent vendors and acquired at reasonable prices.
- ▶ **Inventory management**, which refers to the systems and controls needed to ensure items purchased with federal funds are used for federal programs.
- ▶ **Financial management**, which refers to the systems and controls needed to ensure the costs charged to federal grants are appropriate including budgeting, accounting, and reporting.

It is important that each one of these systems can produce sufficient documentation to walk an auditor or monitor through how grant-related decisions were made, how program requirements were met, and ultimately how federal funds were spent.

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## D1. What are the key elements of a strong procurement system?

LEAs must demonstrate they paid a reasonable price for all goods and services purchased with federal funds. This requires recipients to have strong procurement systems in place.

**Elements of a strong procurement system include:**

- ▶ Written procurement policies, including a code of conduct for all employees involved in the award or administration of contracts, conflict of interest procedures, protest procedures to handle disputes, and selection procedures.
- ▶ Contract administration policies to ensure vendors perform in accordance with the terms and conditions of their contracts.
- ▶ Methods to review proposed procurements to avoid unnecessary or duplicative purchases.
- ▶ Methods for procuring goods or services that foster full and open competition. These methods of competition should be consistent with state and local law.
- ▶ Methods to review contract prices to ensure they reflect a fair market value, this is particularly important when a contract is awarded noncompetitively.
- ▶ Contracts that provide the information needed to monitor a vendor's performance such as what is being purchased, when it must be delivered, where it must be delivered, and any other relevant information.
- ▶ Sufficient documentation to walk an auditor or monitor through the procurement process, including why a particular vendor was selected or rejected and the basis for the contract price

It is not uncommon for procurement policies to be out-of-date when compared to current procurement practices. OSSE encourages recipients to ensure procurement policies are up-to-date to both minimize the risk of audit findings, and to reduce procurement paperwork burdens where possible.

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## D2. What are the elements of a strong inventory management system?

All items purchased with federal funds must benefit the program supporting the cost. This requires LEAs to have systems in place to track the items they purchase with federal funds in order to demonstrate the items are being used in a manner that benefits the relevant program.

How a recipient tracks specific items depends on:

- ▶ Federal requirements, if applicable;
- ▶ State and local law, policies and procedures; and
- ▶ The nature of the item.

Equipment, which is tangible property costing over a certain amount of money, is typically tracked through individual property records. Such records might include:

- ▶ A description of the property;
- ▶ A serial number or other unique identification number;
- ▶ The source of the property;
- ▶ Who holds the title (this is particularly important for equipment purchased by school districts for use by private schools in programs that have equitable participation requirements – although the equipment may be used by a private school, the district purchasing the equipment retains title and must continue to account for the equipment in its inventory management system);
- ▶ The acquisition date;
- ▶ The cost of the property and the percentage of the cost supported with federal funds;
- ▶ The location, use and condition of the property; and/or
- ▶ Any disposition information.

Supplies are tangible personal property under the cost threshold of equipment. Supplies are usually not tracked individually. However, LEAs should be able to establish that supplies purchased with federal funds were received by the program, used by the program, and safeguarded from unauthorized use.

Some supplies are more vulnerable to loss or theft, such as laptops, tablets and other small items. LEAs can mitigate the risk of loss through controls such as:

- ▶ Individual property records such as those described above;
- ▶ Labeling items so they are clearly identified as property of the recipient and/or a particular funding source; and
- ▶ Requiring employees using an item to sign it out so the recipient can identify which employee has custody of the item.

**Please refer to OSSE Equipment and Inventory Guidance for Subgrantees**, found at: <http://osse.dc.gov/service/grants-administration-policy-and-guidance>.

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### D3. What are the elements of a strong financial management system?

Recipients must use fiscal controls and fund accounting procedures that ensure proper disbursement of, and accounting for, federal funds. In short, this means recipients must take steps to ensure:

- ▶ Federal funds are spent properly on allowable costs, taking into account among other requirements:
  - Eligibility requirements;
  - Use of funds rules for the program (what funds can, must, or may not be spent on); and
  - Fiscal rules for the program (including caps, set-asides, grant periods, and rules like supplement not supplant).
- ▶ Sufficient documentation can be produced to prove the funds were spent properly

In sum, an LEA's financial management system, in combination with other systems, must be able to walk an auditor or monitor through all phases of the grants process and should be sufficient so that an objective observer can trace and understand how the federal funds were spent.



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# PART I

## Part I: Consolidated Application Guidance

Title I, Title II, Title III

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# PART I: Consolidated Application Guidance

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## TITLE I, PART A

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### 1. Purpose

Title I, Part A provides financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.

### 2. Eligibility Considerations

Title I, Part A provides funds to LEAs on a formula basis. LEAs that receive Title I funds must, and in some cases may, reserve funds for certain district-level activities. LEAs must then distribute the remaining funds to eligible schools through a process known as “ranking and serving.”

In DC, the ranking and serving requirement only applies to LEAs with multiple schools. For example, a charter school LEA with multiple campuses that are not considered separate schools does not rank and serve among campuses. Instead the charter school LEA is considered a single school and must serve Title I children appropriately depending on the program model selected for the school.

Schools that receive Title I, Part A funds must operate one of two program models, or either a:

- ▶ Targeted assistance model;
- ▶ Schools operating a targeted assistance model must focus Title I services on specific students who are failing, or most at risk of failing, to meet State academic standards; or
- ▶ Schoolwide program model.

Schools operating a schoolwide program model may use Title I funds to upgrade their entire educational programs to improve achievement for all students, particularly the lowest-achieving. Schools may operate a schoolwide program if at least 40 percent of their students are from low-income families. Schools identified as “priority” or “focus” schools are also eligible to operate a schoolwide program model regardless of their poverty level.

The type of program model a school operates has a significant effect on the eligible population, use of funds, and program specific requirements.

#### a. Student Eligibility in a Targeted Assistance School

Students eligible to participate in a Title I targeted assistance program include:

- ▶ Students who are failing, or most at risk of failing, to meet state standards based on multiple, educationally related objective criteria established by the LEA and supplemented by the school;
- ▶ Students who, within the last two years, participated in a Head Start, Even Start, or Early Reading First program, or in Title I preschool services;
- ▶ Students who, within the last two years, received services under the Migrant Education Program;
- ▶ Neglected and delinquent students; and
- ▶ Homeless students.

A targeted assistance school must select specific children who will receive Title I services at the school, and maintain a list of those students.

#### b. Student Eligibility in Schoolwide Program

All students in a schoolwide program school are eligible to participate in Title I funded activities and the school is not required to identify specific eligible students. A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school. Its primary goal is to ensure that all students, particularly those who are low-achieving, demonstrate proficient and advanced levels of achievement on state academic achievement standards.



### 3. Use of Funds

Unlike some other programs, Title I, Part A does not have a specific “use of funds” section. Costs must generally be consistent with the purpose of the grant, but how Title I funds may be used depends on whether the cost is spent centrally at the district level, at the school level in a targeted assistance program school, or at the school level in a schoolwide program school.

#### a. District-Level Uses of Funds

LEAs must retain funds for certain district-level activities such as:

- ▶ Parental involvement (if the LEA receives an allocation of \$500,000 or more) the amount is exactly 1% of the total Title I allocation;
- ▶ Focus/priority LEAs must set aside 20% of Title I, Part A funds to use toward interventions;
- ▶ Services for homeless, neglected, and delinquent students that do not attend Title I schools; and
- ▶ Equitable services for eligible private school students (in DC this is relevant only for DCPS) .

In addition, LEAs may reserve funds:

- ▶ To administer Title I programs set-aside may not exceed more than 10% of total title I allocation;
- ▶ For district-wide initiatives that are permissible under Title I, Part A; and
- ▶ To provide financial incentives and rewards to teachers who serve students in Title I schools that meet the definitions of “priority schools” and “focus schools” for the purpose of attracting and retaining qualified and effective teachers.

Some of these reservations are subject to specific caps and/or mandatory set-aside amounts.

#### b. School-Level Uses of Funds: Targeted Assistance

A targeted assistance school must use Title I, Part A to provide extra services only to Title I eligible students. Each Targeted Assistance school must assist the identified students in meeting the state’s proficient and advanced levels of achievement by coordinating Title I funds with funds received from other sources. In addition, the school providing targeted assistance must review, on an ongoing basis, the progress of participating children.

Under Section 1115(c), a targeted assistance program includes the following 8 components. It must:

- ▶ Use Part A resources to help participating children meet the State’s student performance standards expected for all children.

In order to do this, programs must:

- ▶ Be based on effective means for improving achievement of children.
- ▶ Ensure that planning for participating students is incorporated into existing school planning.
- ▶ Use effective instructional strategies that:
  - Give primary consideration to providing extended learning time such as an extended school year, before- and after-school, and summer programs and opportunities;
  - Help provide an accelerated, high-quality curriculum; and
  - Minimize removing children from the regular classroom during regular school hours for Part A instruction.
- ▶ Coordinate with and support the regular education program, which may include:
  - Counseling, mentoring, and other pupil services;
  - College and career awareness and preparation;
  - Services to prepare students for the transition from school to work; or
  - Services to assist preschool children’s transition to elementary school.

- ▶ Provide instruction by highly qualified staff.
- ▶ Provide professional development opportunities with Part A resources, and other resources, to the extent feasible, for administrators, teachers, and other school staff who work with participating children.
- ▶ Provide strategies to increase parental involvement, such as family literacy services.

Each participating school must assist the identified students in meeting the state's proficient and advanced levels of achievement by coordinating Title I funds with funds received from other sources. In addition, the school providing targeted assistance must review, on an ongoing basis, the progress of participating children. If necessary, the school must provide additional assistance to enable such children to meet the challenging standards, such as an extended school year, before- and after-school programs, summer programs, and training for teachers on how to identify students requiring additional assistance and implement student achievement standards in the classroom.

### **c. School-Level Uses of Funds: Schoolwide program**

A schoolwide program school must use Title I, Part A funds to address the educational needs identified by the school's needs assessment and articulated in the school's comprehensive plan. All students are eligible to participate in Title I funded services.

Once the school has identified its needs, it must develop a plan describing how it will address them. The plan is no longer required to be submitted but must be kept on file by the LEA. A school may not operate a schoolwide program unless it has a schoolwide plan in place. The plan should be aligned to the results of the needs assessment.

Incorporating the required components into the schoolwide plan may require coordination with the district level leadership. For example, a district may carry out professional development activities that can be incorporated into component 4. Similarly, districts may conduct teacher recruitment, hiring and placement activities that can be incorporated into components 3 and 5. The plan should reflect all resources supported by the schoolwide plan, whether those resources are delivered by the district or by the school.

As required by Section 1114(b) (1) of ESEA, schoolwide plans to contain each of the following ten components as well as related measurable goals and strategies for implementation:

- ▶ 1. A comprehensive needs assessment. The goal of the comprehensive needs assessment is to determine:
  - How students are performing academically on statewide assessments;
  - Where teaching and learning needs to be improved in order to help students meet state standards; and
  - What students need in order to achieve academically.

This process helps schools identify performance trends so academic leaders can prioritize the needs of their children before they design strategies to improve academic outcomes.

The comprehensive needs assessment must consider the academic performance of all students including the following subgroups:

- Economically disadvantaged students;
- Students from major racial and ethnic groups;
- Students with disabilities;
- Students with limited English proficiency; and
- Migrant students.

The school must consider student performance on the state assessment, but should also consider other data including enrollment counts, dropout rates, graduation rates, school demographics, classroom observations and/or surveys of students, teachers, parents, and community attitudes and perceptions.

The comprehensive needs assessment must be developed with the participation of individuals who will carry out the schoolwide program plan. This includes but is not limited to principals, assistant principals, teachers, counselors, school social workers, and paraprofessionals. The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results.

- ▶ 2. Schoolwide reform strategies that provide opportunities for all students to meet state standards. These strategies should be research-based and designed to:
  - Strengthen the core academic program in the school;
  - Increase the amount and quality of learning time;
  - Provide an enriched and accelerated curriculum;
  - Meet the educational needs of historically underserved populations;
  - Address the needs of all students in the school, particularly low-achieving students; and
  - Be consistent with state and local improvement plans, if any.
- ▶ 3. Plans for ensuring instruction by highly qualified teachers.
- ▶ 4. Plans for providing high-quality and ongoing professional development for teachers, principals, paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all students in the school, particularly low-achieving students;
- ▶ 5. Strategies to attract high-quality highly qualified teachers to high-need schools.
- ▶ 6. Strategies to increase parental involvement.
- ▶ 7. Plans for assisting preschool children transition from early childhood programs.
- ▶ 8. Measures to include teachers in decisions regarding the use of academic assessments to provide information on, and to improve, the achievement of individual students and the overall instructional program.
- ▶ 9. Activities to provide effective, timely additional assistance to struggling students, including measures to ensure students' difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.
- ▶ 10. Coordination and integration of federal, State, and local services and programs, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

#### Annual Program Evaluation

The school must conduct an annual review of the strategies in the schoolwide plan to determine if they are contributing to the desired outcomes. One way these desired outcomes may be considered is in terms of improvement in student achievement. Another way is in terms of increases in other activities that lead to increased student achievement, such as greater parental involvement or more high-quality professional development. Using the annual evaluation results for making data-based decisions may increase the effectiveness of the plan.

## 4. Fiscal Requirements

Title I, Part A contains three important fiscal rules: (1) supplement not supplant; (2) maintenance of effort; and (3) comparability.

### A. Supplement not Supplant

Title I, Part A is governed by a supplement not supplant provision. The requirements of this provision vary depending on whether the LEA is spending funds at the district-level, in a targeted assistance program school, or in a schoolwide program school.

#### **i. Supplanting at the District-Level and in Targeted Assistance Schools**

At the district-level and in targeted assistance schools supplanting is presumed when:

- ▶ An LEA uses Title I funds to provide services the LEA is required to make available under other federal, state, or local laws.
- ▶ An LEA uses Title I funds to provide services the LEA provided with state or local funds in the prior year.
- ▶ An LEA uses Title I funds to provide the same services to Title I students that the LEA provides with state or local funds to nonparticipating students.

The presumptions can be overcome if the LEA can demonstrate it would not have provided the services in question with non-federal funds had the federal funds not been available. For example, an LEA could provide planning and financial documents showing that a position paid for in the previous year with state and local funds was eliminated in the current year because of state and local budget cuts. The LEA would need contemporaneous records to confirm:

- ▶ There was in fact a reduced amount or lack of state and local funds available to pay for this position; and
- ▶ The LEA made the decision to eliminate the position without taking into consideration the availability of federal funding, along with the reasons for that decision.

As with any cost, the LEA must ensure that the costs being supported with federal funds are allowable under the relevant federal program.

Although the supplement not supplant provision limits the kinds of activities LEAs may support with Title I funds, there are some flexibilities. For example:

- ▶ LEAs may spend Title I funds to support activities mandated by state law if those mandates were enacted to facilitate the state's ESEA Flexibility plan.
- ▶ LEAs that temporarily shift a cost from Title I to state/local funds because of federal funding cuts may move the costs back to Title I once federal funding is restored without violating supplement not supplant.
- ▶ Title I-like activities supported by supplemental state and local funds are excluded from the supplement not supplant analysis.

#### **ii. Supplemental Funds and Schoolwide Schools**

The three presumptions of supplanting do not apply to schoolwide schools. Instead, a "supplemental funds" test applies. In order to meet the "supplemental funds" requirement in a schoolwide program school, the LEA must ensure the school receives all the state and local funds it would receive were it not a Title I schoolwide program school. In other words, an LEA may not reduce its allocation of state and local funds and resources to a schoolwide program school because the school receives federal funds to operate a schoolwide program.

#### **B. Maintenance of Effort**

The Title I maintenance of effort provision prohibits LEAs from substantially reducing the level of state and local funding they spend on free public education from year-to-year.

#### **C. Comparability**

The Title I comparability requirement requires LEAs to use state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.

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## **TITLE II, PART A**

### **1. Purpose**

The purpose of Title II, Part A is to increase academic achievement by improving teacher and principal quality. This program is carried out by: increasing the number of highly qualified teachers in classrooms; increasing the number of highly qualified principals and assistant principals in schools; and increasing the effectiveness of teachers and principals by holding LEAs and schools accountable for improvements in student academic achievement.

## 2. Eligibility Considerations

LEAs should generally target Title II, Part A funds or services to schools that have the lowest proportion of highly qualified teachers, have the largest average class size, or are identified as “priority” or “focus” schools.

## 3. Use of Funds

LEAs are required to conduct a needs assessment to determine the needs of the LEA’s teaching force in order to have all students meet state standards. The LEA must spend its Title II, Part A funds consistent with the results of the needs assessment.

The needs assessment should take into account:

- ▶ The activities the LEA must conduct in order to give teachers the means to provide all students with the opportunity to meet state standards; and
- ▶ The activities the LEA must conduct in order to give principals the instructional leadership skills to help teachers provide all students with the opportunity to meet state standards.

A list of activities Title II can support is available at: <http://www2.ed.gov/policy/elsec/leg/esea02/pg22.html#sec2123>

## 4. Fiscal Requirements

### a. Supplement not Supplant

Title II is governed by a supplement not supplant provision. In Title II, Part A, supplanting is presumed when:

- ▶ An LEA uses Title II funds to provide services the LEA is required to make available under other federal, state or local laws; and
- ▶ An LEA uses Title II funds to provide services the LEA provided with state or local funds in the prior year.

### b. Maintenance of Effort

Title II is also governed by a maintenance of effort provision that prohibits LEAs from substantially reducing the level of state and local funding they spend on free public education from year-to-year.

## TITLE III, PART A

### 1. Purpose

The purpose of Title III, Part A is to ensure children with limited English proficiency (LEP) develop high levels of academic attainment in English and meet the same state standards as all children are expected to meet.

LEAs must use Title III subgrants to carry out activities that use approaches and methodologies that are based on scientifically-based research on teaching limited English proficient children and immigrant children for the following purposes:

- ▶ Developing and implementing new language instruction educational programs and academic content instructional programs for limited English proficient students in early childhood, elementary, and secondary programs.
- ▶ Expanding or enhancing existing language instruction educational programs and academic content instruction programs.
- ▶ Implementing schoolwide programs within individual schools to restructure, reform, and upgrade all programs, activities, and operations related to language instruction educational programs and academic content instruction for limited English proficient students.
- ▶ Implementing in a local educational agency systemwide programs designed to restructure, reform, and upgrade all programs, activities, and operations related to the education of limited English proficient students.

## 2. Eligibility Considerations

LEAs may apply on their own or jointly with other LEAs for a Title III subgrant. In addition, an individual LEA or a group of LEAs may apply in collaboration with a college or university, community-based organization, or a State educational agency.

Once received, Title III subgrants should support the efforts of LEAs to assist limited English proficient students to learn English and meet challenging state academic content and student academic achievement standards.

## 3. Use of Funds

In light of the above purposes, eligible LEA/entities must spend Title III funds on activities:

- ▶ To increase the English proficiency of LEP children by providing high-quality language instruction educational programs that are based on scientifically-based research demonstrating the effectiveness of the programs in increasing English proficiency and student academic achievement in core academic subjects.
- ▶ To provide high-quality professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational programs), principals, administrators, and other school or community-based organizational personnel, that is:
  - Designed to improve the instruction and assessment of LEP children;
  - Designed to enhance the ability of such teachers to understand and use curricula, assessment measures, and instruction strategies for LEP children;
  - Based on scientifically-based research demonstrating the effectiveness of the professional development in increasing children's English proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and
  - Of sufficient intensity and duration (which must not include activities such as one-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers' performance in the classroom, except that this must not apply to an activity that is one component of a long-term, comprehensive professional development plan established by a teacher and the teacher's supervisor based on an assessment of the needs of the teacher, the supervisor, the students of the teacher, and the relevant LEAs.

After performing the required activities described above, LEAs/eligible entities may then use funds for:

- ▶ Upgrading program objectives and effective instruction strategies;
- ▶ Improving the instruction program for LEP children by identifying, acquiring, and upgrading curricula, instruction materials, educational software, and assessment procedures;
- ▶ Providing tutorials and academic or vocational education for LEP children and intensified instruction;
- ▶ Developing and implementing elementary or secondary school language instruction educational programs that are coordinated with other relevant programs and services;
- ▶ Improving the English proficiency and academic achievement of LEP children;
- ▶ Providing community participation programs, family literacy services, and parent outreach and training activities to LEP children and their families:
  - To improve the English language skills of LEP children; and
  - To assist parents in helping their children to improve their academic achievement and becoming active participants in the education of their children.
- ▶ Improving the instruction of LEP children by providing for:
  - The acquisition or development of educational technology or instructional materials;
  - Access to, and participation in, electronic networks for materials, training, and communication;
  - Incorporation of the above two resources into curricula and programs; and
- ▶ Carrying out other activities that are consistent with the purposes of Title III, Part A.



## 4. Fiscal Requirements

### a. Supplement not Supplant

Title III, Part A is governed by a supplement not supplant provision that is more restrictive than other federal programs. The Title III supplement not supplant provision prohibits eligible entities from using Title III, Part A funds to supplant state, local, or other federal funds.

As a result, supplanting is presumed when:

- ▶ An LEA uses Title III funds to provide services the LEA is required to make available under other federal, state or local laws, including civil rights laws.
- ▶ An LEA uses Title III funds to provide services the LEA provided with federal, state or local funds in the prior year.

More information about the Title III supplement not supplant provision is available at: [www2.ed.gov/programs/sfgp/supplefinalattach2.pdf](http://www2.ed.gov/programs/sfgp/supplefinalattach2.pdf).

### b. Maintenance of Effort

Title III, Part A is also governed by a maintenance of effort provision that prohibits LEAs from substantially reducing the level of state and local funding they spend on free public education from year-to-year.

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# **PART II**

## **IDEA Part B Fiscal Guidance**

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## Section I: Funding Overview

Part B of the Individuals with Disabilities Act (IDEA) (PL 108-446) is a federal entitlement grant program that provides funds to state educational agencies (SEAs) and local educational agencies (LEAs) to help ensure that students with disabilities, ages 3 to 21 have access to a free appropriate public education (FAPE) to meet each student's unique needs and prepare him or her for further education, employment, and independent living. These funds are provided to the SEA and LEAs using formulas outlined in the IDEA regulations. IDEA funds are non-discretionary and must be spent for specific purposes.

Pursuant to the District of Columbia Public School Reform Act of 2007, the Office of the State Superintendent of Education (OSSE) serves as the District of Columbia's SEA and is therefore responsible for ensuring compliance with all programmatic and fiscal elements of IDEA.

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## Section II: Funding Requirements

Subgrantees must submit a set of "substantially approvable" assurances to the Division of Special Education (DSE) within the Office of the State Superintendent of Education (OSSE) prior to July 1st of each award year. Subgrantees may begin obligating expenses against their IDEA-B grant funds for each award year or the date that their Phase I application was substantially approved, whichever comes later. Reimbursement requests for expenditures will not be accepted until the Phase II application is completed and approved.

### A. MAINTENANCE OF EFFORT

All public schools within the District of Columbia receiving Special Education Payments and federal grant funds under the Individuals with Disabilities Education Act, must expend, in total or per capita, an equal or greater amount of its non-federal, District funds on allowable special education costs each subsequent fiscal year as required by 34 CFR § 300.203 "Maintenance of effort," except as provided in 34 CFR § 300.204 "Exception to maintenance of effort," and 34 CFR § 300.205 "Adjustment to local fiscal efforts in certain fiscal years."

This requirement applies to the District of Columbia Public Schools (DCPS) and all public charter schools regardless of whether they have elected DCPS as their LEA for special education purposes. Special education attorney fee expenditures made pursuant to 34 CFR § 300.517 shall not be included in the IDEA Maintenance of Effort calculation for DCPS or public charter schools.

If it is determined at any point, that DCPS or a public charter school has failed to maintain level of effort for expenditures made with non-federal, District funds for special education as defined in 34 CFR § 300.203-205 of IDEA, the District shall coordinate with the LEA options for repayment of funds to the U.S. Department of Education.

### B. EXCESS COST

Excess costs are those costs for the education of an elementary school or secondary school student with a disability that are in excess of the average annual per student expenditure in an LEA during the preceding school year for an elementary school or secondary school student, as may be appropriate. An LEA must spend at least the average annual per student expenditure on the education of an elementary school or secondary school child with a disability before funds under Part B of the Act are used to pay the excess costs of providing special education and related services 34 CFR §300.16. Sub-grantees are required to comply with the excess cost requirement annually.

### C. COORDINATED EARLY INTERVENING SERVICES (CEIS)

The Individuals with Disabilities Education Improvement Act amended the IDEA to allow, and sometimes require, local educational agencies (LEAs) to use funds provided under Part B of the IDEA for CEIS. This provision, which is found in section 613(f) of the IDEA (20 U.S.C. §1413(f)) and the regulations in 34 CFR §300.226 permits LEAs to use Part B funds to develop and provide CEIS for students who are currently not

identified as needing special education. LEAs that are found to be “significantly disproportionate” are required to set aside 15% of their federal IDEA award to support students identified as needing additional support. These students cannot have an IEP at the time CEIS is accessed. LEAs are also required to track the progress of students receiving CEIS for at least two subsequent school years and report on whether the student later receives special education or related services.

## SECTION III: MONITORING & COMPLIANCE

### A. COMPLIANCE MONITORING

OSSE’s monitoring and compliance framework aligns to the federal requirements pertaining to SEA monitoring responsibilities. The IDEA Part B regulations at 34 CFR §300.600 require that the SEA monitor the implementation of IDEA Part B, make annual determinations about the performance of each LEA, enforce compliance with IDEA Part B, and report annually on the performance of the SEA and each LEA. The primary focus of the SEA’s monitoring activities must be on improving educational results and functional outcomes for all children with disabilities and ensuring that LEAs meet the program requirements of IDEA Part B. In exercising its monitoring responsibilities, the SEA must ensure that when it identifies noncompliance with the requirements of IDEA Part B by LEAs, the noncompliance is corrected as soon as possible, and in no case later than one year after the SEA’s identification of the noncompliance. All sub-grantees are required to participate in the SEA’s monitoring program.

Included in the monitoring program is the requirement to participate in fiscal monitoring. The fiscal monitoring process includes a review of the LEA’s fiscal policies and procedures, time and effort documentation, MOE compliance, CEIS compliance, accounting systems, etc.

### B. A-133 AUDITING REQUIREMENTS

OMB A-133 (Audits of States, Local Governments, and Non-Profit Organizations) establishes uniform audit requirements and monitoring responsibilities for subgrantees. Subgrantees receiving at least \$750,000 in federal funds are required to undergo an A-133 audit.

### C. TIME AND EFFORT

Federal regulations require each employee funded under a federal grant to have documentation of time and effort reporting. Time and effort reporting should be maintained by the subgrantee and should be submitted to the awarding agency when requested as part of fiscal monitoring responsibilities, either through record audits or when a specific circumstance requires evidence of time and effort reporting.

Time and effort reporting requirements are part of documentation to support an allowable cost as defined by OMB Circular A-87 Attachment B, Section 11 provides rules and regulations related to compensation for personal services. Subsection “H” differentiates the requirements of a semi-annual certification from the requirements of a detailed monthly log. The rule also states charges to federal awards for salaries and wages, whether treated as direct or indirect costs, will be based on payroll records documented in accordance with generally accepted practice of the governmental unit and approved by a responsible official(s) of the governmental unit. Below are the two types of time and effort documentation. Subgrantees should retain at least one of the following for all personnel funded by the IDEA, Part B grant:

**Semi-annual certification:** This certification is completed at least twice a year for staff funded under one federal funding source and one cost objective.

**Personnel Activity Report or PAR:** This log must be completed at least monthly for all staff funded by multiple federal funding sources and/or cost objectives.

## SECTION IV: ALLOWABLE COST CHART

In general, the chart below specifies **the allowable costs** associated with IDEA, Part B 611 and 619 funding:

Budget Item	Allowed	Not Allowed
<b>ADAPTIVE EDUCATION:</b> Salary and fringe benefits.	✓	
<b>ADVERTISING:</b> Costs associated with advertising in media such as newspapers, radio and television, direct mail, exhibits, electronic, or computer transmittals.	✓	
<b>AIDES:</b> Salaries and fringe benefits.	✓	
<b>ASSISTIVE TECHNOLOGY DEVICES:</b> Used to increase, maintain, or improve the functional capabilities of a child with a disability.	✓	
<b>AUTOMATIC DOOR OPENERS:</b> Purchase and installation.	✓	
<b>BUILDING CONSULTATION TEAMS:</b> Salaries and fringe of team members, costs associated with meeting expenses, stipends, and travel.		✗
<b>CHILD FIND ACTIVITIES:</b> Costs associated with public awareness, notices, and screening.	✓	
<b>CLASSROOM SPACE RENTAL:</b> Costs associated with renting extra classroom space for special education students due to overcrowding.		✗
<b>CLERICAL SUPPORT:</b> Salaries and fringe benefits.	✓	
<b>COLLEGE CREDITS FOR SPECIAL EDUCATION INSTRUCTIONAL STAFF</b>	✓	
<b>COMPUTER NETWORKS:</b> Costs associated with a LEA's computer networks.		✗
<b>CONSULTANT SERVICES:</b> Costs associated with contracted services from a consultant (non-CESA or CDEB personnel)	✓	
<b>CONTRACTED SPECIAL EDUCATION OR RELATED SERVICES (non-2R Charter School)</b>		✗
<b>CONTRACTED SERVICES FOR SPECIAL EDUCATION OR RELATED SERVICES (2R Charter School or Equitable Services)</b>	✓	
<b>CONTRACTED SERVICES - PARENTALLY-PLACED PRIVATE SCHOOL STUDENTS</b>	✓	
<b>CURRICULUM DEVELOPMENT:</b> Costs associated with substitutes, release time, or extended contract.	✓	
<b>DISTRICT ADMINISTRATORS:</b> Salaries and fringe benefits.		✗
<b>EDUCATIONAL INTERPRETERS:</b> Salaries and fringe benefits. See also "Foreign Language Interpreters for Students."	✓	
<b>EQUIPMENT - NON-CAPITAL:</b> Equipment to support special education and related services.	✓	

Budget Item	Allowed	Not Allowed
<b>EXTENDED SCHOOL YEAR (ESY):</b> Personnel, supplies, equipment, transportation, and any other services identified in the student's IEP.	✓	
<b>FOREIGN LANGUAGE INTERPRETERS FOR STUDENTS:</b> Salaries and fringe benefits or contracted costs.		✗
<b>FOREIGN LANGUAGE AND SIGN LANGUAGE INTERPRETERS FOR IEP MEETINGS:</b> Salaries and fringe benefits or contracted costs.	✓	
<b>IEP TEAM COORDINATORS:</b> Salaries and fringe benefits.	✓	
<b>INDIRECT COSTS:</b> Costs incurred to benefit more than one program or objective not readily assignable to the programs.	✓	
<b>INTERNS:</b> Costs associated with interns working in the school district.		✗
<b>JOB COACHES:</b> A job coach works directly with a student with a disability in a work site to help the student learn the specific requirements of the job, learn work-related activities and requirements, and learn appropriate work-related behaviors.	✓	
<b>LEGAL EXPENSES:</b> Attorney fees for IDEA state complaints, due process hearings, representation at IEP team meetings, facilitated IEP team meetings, mediation sessions, or any student-specific consultation.		✗
<b>LEGAL EXPENSES - PROFESSIONAL DEVELOPMENT / POLICY DEVELOPMENT:</b> Contracted staff training, in-service, or policy development and review.	✓	
<b>MAINTENANCE OF SPECIAL EDUCATION EQUIPMENT:</b> Assistive technology devices, copying machines, printers, elevators, etc.	✓	
<b>MEDICAID SCHOOL-BASED SERVICES PROGRAM:</b> Costs for claiming Medicaid funds, including third-party administrators.		✗
<b>OCCUPATIONAL THERAPISTS (OT) and OT ASSISTANTS:</b> Salaries and fringe benefits for LEA employees or costs for contracted OT services.	✓	
<b>OFFICE EQUIPMENT:</b> Equipment used by special education staff.	✓	
<b>OPEB:</b> Costs associated with Other Post- Employment Benefits.	✓	
<b>PARAPROFESSIONALS:</b> Salaries and fringe benefits.	✓	
<b>PHYSICAL THERAPISTS (PT) and PT ASSISTANTS:</b> Salaries and fringe benefits for LEA employees or costs for contracted PT services.	✓	
<b>PARENTALLY-PLACED PRIVATE SCHOOL STUDENTS – SPECIAL EDUCATION AND RELATED SERVICES:</b> Equitable services.	✓	
<b>PLAYGROUND EQUIPMENT:</b> Accessible playground equipment.	✓	
<b>PRESCHOOL TUITION:</b> Tuition paid to non-LEA preschool programs.	✓	
<b>PRINCIPALS OR ASSISTANT PRINCIPALS:</b> Salaries and fringe benefits.		✗

Budget Item	Allowed	Not Allowed
<b>PROFESSIONAL DEVELOPMENT:</b> Costs associated with registration fees, travel, conference expenses, and providers.	✓	
<b>PSYCHOLOGISTS – STUDENT EVALUATIONS:</b> Contractual costs.	✓	
<b>SECRETARIAL STAFF:</b> Salaries and fringe benefits.	✓	
<b>SOCIAL WORKERS – STUDENT EVALUATIONS:</b> Contractual costs.	✓	
<b>STAFF DEVELOPMENT:</b> Costs associated with registration fees, travel, conference expenses, and providers.	✓	
<b>STIPENDS FOR STUDENTS WITH DISABILITIES:</b> Costs associated with student workers charged under salaries or purchased services.	✓	
<b>STUDENT CONSULTATION TEAMS:</b> Salaries and fringe of team members, meeting expenses, stipends, travel.		✗
<b>SUBSTITUTE TEACHERS:</b> Salaries and fringe benefits.	✓	
<b>SUMMER SCHOOL:</b> Salaries and fringe of instructors, aides, paraprofessionals, adaptive equipment, transportation, supplies, or any other costs related to a student with disabilities attending summer school. <i>See also “Extended School Year (ESY).”</i>		✗
<b>SUPERINTENDENTS (DISTRICT ADMINISTRATORS):</b> Salaries and fringe benefits.		✗
<b>TEACHERS – SPECIAL EDUCATION:</b> Salaries and fringe benefits.	✓	
<b>TIMEOUT ROOMS:</b> Construction or alteration of facilities.		✗
<b>TRANSITION SERVICES – PRESCHOOL:</b> Costs associated with preschool transition activities.	✓	
<b>TRANSITION – EMPLOYMENT SKILLS:</b> Costs associated with work experiences, job coaches, and acquisition of employment skills.	✓	
<b>TRANSITION – INDEPENDENT LIVING SKILLS:</b> Rental of property used for developing independent living skills.	✓	
<b>TRANSPORTATION COSTS - SPECIAL EDUCATION:</b> Costs incurred by the LEA for transporting children with disabilities.	✓	
<b>TRANSPORTATION COSTS – CONTRACTED FOR SPECIAL EDUCATION:</b> Costs associated with private agencies, other LEAs, or parents.	✓	
<b>TUITION FOR SPECIAL EDUCATION INSTRUCTIONAL STAFF</b>	✓	
<b>TUITION – TECHNICAL COLLEGE CLASSES FOR STUDENTS WITH DISABILITIES:</b> Tuition to a local technical college for a special education program for a student with a disability.	✓	
<b>UNEMPLOYMENT INSURANCE:</b>	✓	







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# PART III

## Carl D. Perkins Guidance

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## Purpose of the Carl D. Perkins Act of 2006 (Perkins Section 2)

The purpose of the Perkins Act is to support the development and improvement of the academic and career and technical skills of secondary and postsecondary education students who elect to enroll in career and technical education programs, by:

- ▶ Building on the efforts of States and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high-skill, high-wage, or high-demand occupations in current or emerging professions.
- ▶ Promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students.
- ▶ Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education.
- ▶ Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs, services, and activities.
- ▶ Providing technical assistance that:
  - Promotes leadership, initial preparation, and professional development at the State and local levels; and
  - Improves the quality of career and technical education teachers, faculty, administrators, and counselors; Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area career and technical education schools, local workforce investment boards, business and industry, and intermediaries.
- ▶ Providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.

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## The DC State Office of Career and Technical Education (SOCTE)

The Public Education Reform Amendment Act of 2007 established the Office of the State Superintendent of Education (OSSE) as the State Education Agency (SEA) for the District of Columbia (DC Code § 38-2601.01). The State Office of Career and Technical Education (SOCTE) is the division within OSSE responsible for the administration of the Perkins grant in DC.

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## Funding Allocation (Perkins Sections 131 & 132)

The statute requires that eighty-five percent of each State's annual grant under Perkins be "passed through" to eligible recipients. The other fifteen percent is administered by the State for administration and leadership activities.

Recipients may reserve up to five percent of their grant for administrative activities. The remaining ninety-five percent must be spend on activities to improve CTE programs (see allowable uses of funds section, Perkins Section 135). All federal funds must be obligated during the period of availability (see period of availability section for more information).

Perkins IV sets forth formulas for the allocation of funds available among participating recipients.

## Distribution of Funds to Secondary CTE Programs

The distribution formula for pass through funds to secondary recipients is as follows:

**Thirty percent** shall be allocated to LEAs in proportion to the numbers of individuals aged 5 through 17 who reside in the school district served by the LEA for the preceding fiscal year compared to the total number of individuals aged 5 through 17 who reside in the school districts served by all LEAs in the State for the preceding fiscal year, as determined on the basis of the most recent:

- ▶ (a) census data provided for the purpose of determining eligibility under Title I of the Elementary and Secondary Education Act of 1965 (ESEA); or
- ▶ (b) student membership data collected by the National Center for Education Statistics through the Common Core of Data survey system.

**Seventy percent** shall be allocated to LEAs in proportion to the number of individuals aged 5 through 17 who reside in the school district served by the LEA and are from families below the poverty level for the preceding fiscal year, as determined on the basis of the most recent data used under section 1124(c)(1)(A) of the ESEA, compared to the total number of individuals aged 5 through 17 who reside in the school districts served by all the LEAs in the State for the preceding fiscal year.

If necessary, SOCTE will adjust the data used to make the allocations described above to reflect changes in school district boundaries that have occurred since the data was collected, and to include LEAs without geographical boundaries, such as charter schools and Bureau of Indian Affairs funded secondary schools.

### MINIMUM ALLOCATION

As provided in the Perkins statute, under the formula described above, LEAs must receive an allocation that is greater than \$15,000. If an LEA does not meet this threshold, the LEA must enter into a consortium with other local educational agencies for purposes of meeting the minimum allocation requirement. Funds allocated to a consortium must be used only for purposes and programs that are mutually beneficial to all members of the consortium. Funds may not be reallocated to individual members of the consortium for purposes or programs benefiting only one member of the consortium.

### WAIVER OF MINIMUM ALLOCATION

An LEA charter school that does not meet the minimum allocation requirement may still receive an allocation without entering into a consortium if the LEA charter school requests and is approved for a waiver from SOCTE. The waiver request must:

- ▶ Be in writing;
- ▶ Be on the LEA charter school's letterhead;
- ▶ Be signed by a representative from the LEA charter school with appropriate authority; and
- ▶ Include the following:
  - Evidence that the charter school is operating a career and technical education program(s); and
  - Evidence demonstrating that the charter school is unable to enter into a consortium for purposes of providing Perkins activities.

## Distribution of Funds to Postsecondary CTE Programs

Postsecondary subgrants are allocated in proportion to each institution's share of the total State number of Pell Grant recipients.

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# CTE Application Plans

Any eligible recipient desiring a Perkins subgrant must submit a local plan to the State. New recipients must submit a CTE LEA Five-Year Plan. Recipients with Five-Year Plans on file must submit a CTE Annual Report.

**Recipients that have an expired Five-Year Plan must submit a plan amendment.** Recipients may not begin to obligate grants funds until they have received notification from the State Office of Career and Technical Education (SOCTE) that the CTE LEA Five-Year Plan or CTE Annual Report has been substantially approved.

## CTE LEA Five-Year Plan Requirements (Perkins Sections 134 & 135)

Each recipient must submit a CTE LEA Five-Year Plan and submit any revisions to the plan annually in the Annual Report. Recipients must describe the use of funds in the Five-Year Plan according to the requirements below: (Please note, a Five-Year Plan template is available from SOCTE.)

- ▶ Describe how the funds will be used according to Perkins Required and Permissive uses of funds (Perkins section 135);
- ▶ Describe how the CTE activities will contribute to meeting State and local adjusted levels of performance (core performance indicators);
- ▶ Describe how the appropriate courses of **at least 1 CTE program of study** will be offered that:
  - Incorporates secondary education and postsecondary education elements;
  - Includes coherent and rigorous content aligned with challenging academic standards and relevant career and technical content in a coordinated, non-duplicative progression of courses that align secondary education with postsecondary education to adequately prepare students to succeed in postsecondary education;
  - May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits; and
  - Leads to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree.
- ▶ Describe how comprehensive professional development for CTE, academic, guidance, and administrative personnel will be provided that promotes integration of challenging academic standards and relevant CTE skills and that improves instruction (including curriculum development);
- ▶ Describe how parents, students, teachers, and representatives of business and industry, special populations, and labor organizations participate in the development, implementation, and evaluation of the CTE programs funded by Perkins;
- ▶ Provide assurances that services and activities of CTE programs are of sufficient size, scope, and quality to improve the quality of the CTE programs offered;
- ▶ Describe how CTE programs are evaluated;
- ▶ Describe how special populations are prepared for high-skill, high-wage, or high-demand occupations that lead to self-sufficiency, how strategies are adopted to prevent barriers to access and success for special populations in programs, and how special populations meet core indicator performance levels;
- ▶ Describe how individuals who are members of special populations will not be discriminated against on the basis of their status as members of special populations (as defined in Perkins legislation);
- ▶ Describe how Perkins funds will be used to promote preparation for non-traditional fields;
- ▶ Describe how career guidance and academic counseling will be provided to CTE students, including linkages to future education and training opportunities; and
- ▶ Describe efforts to recruit and retain CTE teachers, faculty, and career guidance and academic counselors, including individuals in groups underrepresented in the teaching profession, and describe efforts to attract teachers from business and industry.

## Annual Reports

Each year, Perkins recipients with existing Five-Year Plans must submit an Annual Report in order to receive funding for the upcoming year. The Annual Report must include the following:

### 1. Letter of Transmittal

A brief Letter of Transmittal is the formal request to apply for Perkins funds. It should be on letterhead and signed by an official duly authorized to act on behalf of the recipient. Letters of Transmittal may be submitted electronically in Word or PDF format.

### 2. Narrative

A brief narrative should explain progress made in program improvements. It should also explain such changes to the recipient's approved CTE LEA Five-Year Plan as may be appropriate and necessary to accommodate progress on planned activities or unanticipated changes in circumstances, to reflect budget updates or policy shifts, or when applicable to reinforce a Local Program Improvement Plan under Perkins section 123.

### 3. Budget Matrix

An update to the approved budget must reflect formula allotments for the coming program year, and as needed for consistency with its Annual Report or a Local Program Improvement Plan.

### 4. Action Plan

To meet the data demands of SOCTE payment tracking and recipient monitoring systems, each recipient must also submit the Annual Action Plan: a detailed annotated budget for the applicable program year of the Perkins subgrant, organized in terms of the Required and Permissible local uses of Perkins funds enumerated in sections 135(b) and 135(c) of Perkins. An Action Plan template available from SOCTE.

### 5. LEA Improvement Plan (where applicable)

Any recipient whose program performance in any program year on any indicator under Perkins section 113 falls below ninety percent of the negotiated target level for that indicator for that year must submit, in compliance with Section 123(b) (2), a LEA Program Improvement Plan, designed to close the gap between the agreed-upon and observed performance levels for the given indicator. Failure to implement an Improvement Plan or failure to reach the ninety percent performance indicator over three consecutive program years may subject the recipient to additional corrective actions.

## Substantially Approvable Applications

Pursuant to the Education Department General Administrative Regulations (EDGAR) section 76.708, SOCTE may allow a recipient who has submitted a "substantially approvable application" to begin to obligate funds even though the recipient's CTE LEA Five-Year Plan or Annual Report may not be finally approved. If, due to minor problems with the substance of the Plan, the Plan has not been approved by July 1, but other than a few minor discrepancies would be approvable, SOCTE will provide that recipient with notification by July 1 that the recipient's Plan is "substantially approvable." Once the recipient has received notification that the recipient's Plan is "substantially approvable," funds may be obligated. The recipient's grant award, however, will not be issued by SOCTE until the Plan has received final approval by SOCTE. Any obligations incurred by a recipient that are **determined to be outside of the approved budget may not be reimbursed with Perkins funds.**

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# CTE Programs/ Programs of Study (POS)

## Program of Study Framework

The “**National Career Clusters Framework**” is an organizing tool for curriculum design and instruction that provides the organizational structure for the District of Columbia CTE programs and programs of study (POS). It refers to a national classification of broad categories of industries and occupations and the knowledge and skills needed for career success in those occupations. There are 16 Clusters. Each **Cluster** includes many occupations which are further classified into smaller groupings termed Pathways. A **Pathway** is a sub-grouping of occupations or career specialties that is used as an organizing tool for curriculum design and instruction. Within Pathways are CTE **programs or POS**, each consisting of a non-duplicative sequence of courses.

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## 16 CAREER CLUSTERS

- ▶ Agriculture, Food & Natural Resources;
- ▶ Architecture & Construction;
- ▶ Arts, Audio/Video Technology & Communications;
- ▶ Business Management & Administration;
- ▶ Education & Training;
- ▶ Finance;
- ▶ Government & Public Administration;
- ▶ Health Science;
- ▶ Hospitality & Tourism;
- ▶ Human Services;
- ▶ Information Technology;
- ▶ Law, Public Safety, Corrections & Security;
- ▶ Manufacturing;
- ▶ Marketing;
- ▶ Science, Technology, Engineering & Mathematics; and
- ▶ Transportation, Distribution & Logistics.

In order to use Perkins funds on activities in a new CTE POS or program, the POS or program must be approved by SOCTE.

### A CTE Program is a program that offers a sequence of courses that:

- ▶ Provides individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions;
- ▶ Provides technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree;
- ▶ May include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph; and
- ▶ Include competency-based applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual.

### A CTE POS is a sequence of courses that:

- ▶ Incorporates secondary education and postsecondary education elements;
- ▶ Includes coherent and rigorous content aligned with challenging academic standards and relevant career and technical content in a coordinated, non-duplicative progression of courses that align secondary education with postsecondary education to adequately prepare students to succeed in postsecondary education;
- ▶ May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits; and
- ▶ Leads to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree.

While both a CTE program and a POS may include secondary and postsecondary elements, a POS will have to show greater evidence of planning demonstrating how participants will be guided from secondary education through postsecondary education leading to a postsecondary level certificate or degree.

## Program/Program of Study Approval Process

The CTE program/POS approval process facilitates Perkins Grant recipients in supporting and preparing students to acquire demanding, industry-based technical and academic knowledge and skills needed for success in high school and postsecondary education, and in high-skill, high-wage, or high-demand careers.

In the District of Columbia, CTE program or POS approval will be the eligibility threshold for LEAs and postsecondary institutions to access federal Perkins funds. The CTE program/POS approval process provides an external measurement of a CTE program's readiness, sustainability, quality, and continuous improvement process.

## Application for Approval

For CTE programs/POS to qualify for and receive Perkins Grant funding, all programs and programs of study must be approved by the State. Approval will be granted when State CTE Program or POS Approval Applications are submitted with sound evidence that all required Core Elements (below) are in place.

The CTE Program/POS Approval Process measures a CTE program/POS's capacity to establish and sustain the CTE Core Elements and to provide students with the necessary skills for entry into a postsecondary opportunity. The process identifies and evaluates program quality and the need for program improvement.

## Core Elements of CTE Programs and Programs of Study

Six core elements must be present for all CTE programs, and an additional seventh element--a dual enrollment or articulation agreement--must be present in all **CTE programs of study** in the District of Columbia.

**Core Element 1 - Demonstrate the need for a CTE program or POS by presenting labor market data and economic development projections that indicate current or projected employment prospects in the program's occupational area.**

### Labor market data and information will:

- ▶ Identify local, regional, state, federal, and/or global workforce data that verify a current and/or projected labor market need for new and replacement workers;
- ▶ Identify current and projected wages for the CTE program related occupations;
- ▶ Identify necessary education attainment and certifications related to occupations within the CTE program of study; and
- ▶ List relevant occupations.



**For labor market data sources, visit:**

- ▶ DC Department of Employment Services;
- ▶ US Bureau of Labor Statistics Employment Projects Program;
- ▶ Occupational Outlook Handbook;
- ▶ Career One Stop;
- ▶ District of Columbia Labor Market Information; and/or
- ▶ Department of Labor Economic and Labor Market Data.

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**Core Element 2 - Establish a non-duplicative sequence of courses.**

**The sequence of courses will be reflected in a chart in the application that:**

- ▶ Maps out the sequence of recommended CTE and academic courses; and
- ▶ Illustrates a progression to more occupationally-specific courses within high school or postsecondary CTE curricula. The sequence of courses should encompass the knowledge and skills required for entry into careers or further advanced training or studies.

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**Core Element 3 - Use industry-recognized, rigorous CTE technical skill standards.**

**CTE programs and POS in the District will be standards-based and incorporate the following:**

- ▶ Industry-recognized technical standards that are valued in the workplace;
- ▶ Embedded Common Core State Standards in English language arts and math;
- ▶ Rigorous employability standards;
- ▶ Standards-to-course-crosswalks that indicate where standards will be learned within the sequence of courses;
- ▶ Standards that facilitate a learner to earn industry-recognized certification or credentials or postsecondary certification or degrees.

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**Core Element 4 - Use technical skills assessments (TSAs) to measure student attainment of technical skills.**

**CTE programs and POS will implement State-approved technical skill assessments at or near the end of the sequence of courses:**

- ▶ Technical skill assessments must be valid, reliable, and aligned with industry standards;
- ▶ To see the full list of CTE State-approved TSAs, please visit the SOCTE website and search for the Division of Postsecondary and Career Education.

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**Core Element 5 - Provide professional skill development opportunities for administrators and faculty to foster CTE POS design, implementation, and improvement.**

**Professional development will:**

- ▶ Support the alignment of curriculum from grade to grade (9-12) and from secondary to postsecondary education (vertical curriculum alignment);
- ▶ Ensure that teachers and faculty have the content knowledge to align and integrate curriculum and instruction;
- ▶ Support the implementation of integrated academic and career and technical curriculum and instruction;
- ▶ Foster innovative teaching and learning strategies;
- ▶ Emphasize the importance of reading, writing, and math skills; and
- ▶ Assist teachers in using CTE accountability data, student achievement data, and assessment data to drive instruction.



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**Core Element 6** - Establish a CTE Industry Advisory Committee (IAC) among business and industry, postsecondary, and other community stakeholders central to the CTE Program or POS's design, implementation, and improvement.

**The Industry Advisory Committee (IAC) will:**

- ▶ Include representatives of business, industry, and labor organizations, partners in local workforce and economic development, secondary and postsecondary partners, and representatives of special populations;
- ▶ Recommend current technical and workforce readiness skills to be taught in the CTE program;
- ▶ Provide curriculum and assessment recommendations to align with labor market needs;
- ▶ Advocate on behalf of the CTE program or POS to local businesses and business organizations;
- ▶ Define the roles and responsibilities of partnership members; and
- ▶ Link to existing initiatives that promote workforce and economic development.

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**Core Element 7** - Develop articulation or dual enrollment agreements between the secondary and postsecondary schools. This element is required for POS approval. However, SOCTE encourages CTE programs to include such agreements as well.

**Articulation and Dual Enrollment agreements in the District will:**

- ▶ Provide a clear pathway of courses in which students may enroll at the postsecondary level, allowing them to continue their CTE program of study at the postsecondary level;
- ▶ Provide a process for students to earn postsecondary credit for postsecondary courses taken while the student is enrolled in secondary education;
- ▶ Provide for the immediate awarding of college credit on a transcript given to students at the time of completing the college course/s thus allowing students to transfer seamlessly into another postsecondary institution without the need for additional paperwork or petitioning for credit; and
- ▶ Describe in the articulation or dual enrollment agreement the expectations and requirements for, at a minimum, teacher and faculty qualifications, course prerequisites, postsecondary entry requirements for students, location of courses, tuition reimbursement, and the credit transfer process.

### **Program/POS Approval Process**

To begin the approval process, LEAs and colleges must complete a CTE Program & Program of Study Approval Application and submit it to SOCTE. CTE Program /Program of Study Approval Applications will be accepted in February and March of each year.

Within 35 days, SOCTE will notify applicants whether their applications received State approval. For those applications deemed not to be program-ready or lacking evidence that all Core Elements are in place, the State will indicate which elements need strengthening and, in general, in what ways the prospective recipient needs to improve the application to increase its likelihood of being approved.

The applicant will be scheduled for a meeting with SOCTE to discuss the prospective CTE program or POS and will be granted six months to submit an approvable application. If an approvable application is not submitted, the State may exercise the authority to deem the program ineligible for Perkins funding in the next fiscal year. **New programs may not be eligible for Perkins funding until they receive full approval.**

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# Allowable Uses of Funds (Perkins Section 135)

Pursuant to the Perkins statute, there are certain mandatory and permissive uses for the grant funds received by recipients.

## Required Uses of Funds

**Recipients are required to use Perkins funds to:**

- ▶ 1. Strengthen the academic and career and technical skills of students participating in CTE programs, by strengthening the academic and CTE components of such programs through the integration of academics with CTE programs through a coherent sequence of courses, such as career and technical programs of study to ensure learning in:
  - a. The core academic subjects; and
  - b. CTE subjects.
- ▶ 2. Link CTE at the secondary level and CTE at the postsecondary level, including by offering the relevant elements of not less than one program of study;
- ▶ 3. Provide students with strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences;
- ▶ 4. Develop, improve, or expand the use of technology in CTE, which may include—
  - Training of CTE teachers, faculty, and administrators to use technology, which may include distance learning;
  - Providing CTE students with the academic and career and technical skills (including the mathematics and science knowledge that provides a strong basis for such skills) that lead to entry into the technology fields; or
  - Encouraging schools to collaborate with technology industries to offer voluntary internships and mentoring programs, including programs that improve the mathematics and science knowledge of students.
- ▶ 5. Provide professional development programs that are consistent with section 122 to secondary and postsecondary teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated CTE, including:
  - In-service and pre-service training on:
    - ✦ Effective integration and use of challenging academic and career and technical education provided jointly with academic teachers to the extent practicable;
    - ✦ Effective teaching skills based on research that includes promising practices;
    - ✦ Effective practices to improve parental and community involvement; and
    - ✦ Effective use of scientifically based research and data to improve instruction.
  - Support of education programs for teachers of CTE in public schools and other public school personnel who are involved in the direct delivery of educational services to CTE students, to ensure that such teachers and personnel stay current with all aspects of an industry;
  - Internship programs that provide relevant business experience; and
  - Programs designed to train teachers specifically in the effective use and application of technology to improve instruction.
- ▶ 6. Develop and implement evaluations of the CTE programs carried out with funds under this title, including an assessment of how the needs of special populations are being met;
- ▶ 7. Initiate, improve, expand, and modernize quality CTE programs, including relevant technology;
- ▶ 8. Provide services and activities that are of sufficient size, scope, and quality to be effective; and
- ▶ 9. Provide activities to prepare special populations, including single parents and displaced homemakers who are enrolled in CTE programs, for high-skill, high-wage, or high-demand occupations that will lead to self-sufficiency.

It is the Office of Vocational and Adult Education's (OVAE) policy that while a recipient must demonstrate that it is complying with all required uses; the recipient does not have to use federal Perkins funds to satisfy all required uses. See OVAE Non-Regulatory Guidance, version 1.0, Question D.11 (Jan 9, 2007), available at: <http://cte.ed.gov/perkinsimplementation/nrg.cfm>.

#### Permissive Uses of Funds

- ▶ As long as all required uses are being addressed, a recipient may use Perkins funds for the following permissive uses:
- ▶ To involve parents, businesses, and labor organizations as appropriate, in the design, implementation, and evaluation of CTE programs authorized under this title, including establishing effective programs and procedures to enable informed and effective participation in such programs;
- ▶ To provide career guidance and academic counseling for students participating in CTE programs, that—
  - Improves graduation rates and provides information on postsecondary and career options, including baccalaureate degree programs, for secondary students, which activities may include the use of graduation and career plans; and
  - Provides assistance for postsecondary students, including for adult students who are changing careers or updating skills.
- ▶ For local education and business (including small business) partnerships, including for—
  - Work-related experiences for students, such as internships, cooperative education, school-based enterprises, entrepreneurship, and job shadowing that are related to CTE programs;
  - Adjunct faculty arrangements for qualified industry professionals; and
  - Industry experience for teachers and faculty.
- ▶ To provide programs for special populations;
- ▶ To assist career and technical student organizations;
- ▶ For mentoring and support services;
- ▶ For leasing, purchasing, upgrading, or adapting equipment, including instructional aids and publications (including support for library resources) designed to strengthen and support academic and technical skill achievement;
- ▶ For teacher preparation programs that address the integration of academic and CTE and that assist individuals who are interested in becoming CTE teachers and faculty, including individuals with experience in business and industry;
- ▶ To develop and expand postsecondary program offerings at times and in formats that are accessible for students, including working students, through the use of distance education;
- ▶ To develop initiatives that facilitate the transition of sub-baccalaureate CTE students into baccalaureate degree programs, including:
  - Articulation agreements between sub-baccalaureate degree granting CTE postsecondary educational institutions and baccalaureate degree granting postsecondary educational institutions;
  - Postsecondary dual and concurrent enrollment programs;
  - Academic and financial aid counseling for sub-baccalaureate CTE students that informs the students of the opportunities for pursuing a baccalaureate degree and advises the students on how to meet any transfer requirements;
  - Other initiatives, such as to encourage the pursuit of a baccalaureate degree; and to overcome barriers to enrollment in and completion of baccalaureate degree programs, including geographic and other barriers affecting rural students and special populations;
- ▶ To provide activities to support entrepreneurship education and training;
- ▶ For improving or developing new CTE courses, including the development of new proposed career and technical programs of study for consideration by the eligible agency and courses that prepare individuals academically and technically for high-skill, high-wage, or high-demand occupations and dual or concurrent enrollment opportunities by which CTE students at the secondary level could obtain postsecondary credit to count towards an associate or baccalaureate degree;
- ▶ To develop and support small, personalized career themed learning communities;

- ▶ To provide support for family and consumer sciences programs;
- ▶ To provide CTE programs for adults and school dropouts to complete the secondary school education, or upgrade the technical skills, of the adults and school dropouts;
- ▶ To provide assistance to individuals who have participated in services and activities under this Act in continuing their education or training or finding an appropriate job;
- ▶ To support training and activities (such as mentoring and outreach) in nontraditional fields;
- ▶ To provide support for training programs in automotive technologies;
- ▶ To pool a portion of such funds with a portion of funds available to not less than 1 other eligible recipient for innovative initiatives, which may include:
  - Improving the initial preparation and professional development of career and technical education teachers, faculty, administrators, and counselors;
  - Establishing, enhancing, or supporting systems for accountability data collection under the Perkins Act;
  - Reporting data under the Perkins Act;
  - Implementing career and technical programs of study; or
  - Implementing technical assessments.
- ▶ To support other CTE activities that are consistent with the purpose of the Perkins Act.

Although Perkins grant funds may not be used towards remedial courses, OVAE has ruled that Perkins funds may be used for remedial services. A course would be considered to be remedial “if it were designed to provide instruction in reading, writing and mathematics for students who have not acquired the basic skills necessary to succeed in general or career education.” OVAE Non-Regulatory Guidance, version 3.0, Question D.18 (May 28, 2009), available at <http://cte.ed.gov/perkinsimplementation/nrg.cfm>. Remedial services are services related to curriculum modification, equipment modification, classroom modification, supportive personnel, and instructional aids and devices. OVAE Non-Regulatory Guidance, version 3.0, Question D.20 (May 28, 2009). An eligible recipient, for example, could fund tutoring services provided by supportive personnel, even if the tutoring were remedial.

## Basic Cost Principles

In addition to the mandatory and permissive uses outlined in the Perkins Act itself, all expenditures made by recipients with federal Perkins funds must meet the basic cost principles found in OMB Circulars. OMB Circular A-87 establishes “federal cost principles” for states, local, and Indian tribal governments. Postsecondary institutions are subject to OMB Circular A-21, cost principles for educational institutions. The cost principles of OMB Circulars A-87 and A-21 are the basic guidelines describing permissible ways federal funds may be spent. The general principles in OMB Circulars A-87 and A-21 state that for costs to be allowable, they must be:

- ▶ Reasonable and necessary (meaning that, for example, sound business practices were followed, and purchases were comparable to market prices);
  - A cost may be reasonable if the nature of the goods or services acquired and the amount involved reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made. See OMB Circular A-87, Appendix A(C)(2).
- ▶ Allocable to the federal award (meaning that the federal grant program, in this case Perkins, derived a benefit in proportion to the funds charged to the program, for example if fifty percent of an instructor’s salary is paid with Perkins funds, then that instructor must spend at least fifty percent of his or her time on a Perkins program);
- ▶ Legal under state and local law;
- ▶ Are properly documented (and accounted for on a consistent basis with generally accepted accounting principles);
- ▶ Consistent with the provisions of the grant program; and
- ▶ Not used for cost-sharing or matching any other grant agreement.

## APPLICABLE CREDITS

The term “applicable credits” refers to those receipts or negative expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are:

- ▶ Purchase discounts;
- ▶ Rebates or allowances;
- ▶ Recoveries or indemnities to SOCTE; and
- ▶ Adjustments of overpayments or erroneous charges.

To the extent that such credits accruing to or received by the State relate to the federal award, they shall be credited to the federal award, either as a cost reduction or cash refund, as appropriate.

## SPECIFIC ITEMS OF COST

OMB Circular A-87, Appendix B provides cost principles that LEAs must apply when determining whether 43 specific costs are allowable. LEAs must check all costs on a cost-by-cost basis against the requirements listed above as well as the requirements in the chart below to ensure the cost is allowable. **Not all specific costs listed in the following chart are allowable.**

The list in OMB Circular A-87, Appendix B includes the following (in alphabetical order):

1. Advertising and public relations costs	23. Interest
2. Advisory councils	24. Lobbying
3. Alcoholic beverages	25. Maintenance, operations, and repairs
4. Audit costs and related services	26. Materials and supplies costs
5. Bad debt	27. Meetings and conferences
6. Bonding costs	28. Memberships, subscriptions, and professional activity costs
7. Communication costs	29. Patent costs
8. Compensation for personal services	30. Plant and homeland security costs
9. Contingency provisions	31. Pre-award costs
10. Defense and prosecution of criminal and civil proceedings and claims	32. Professional services costs
11. Depreciation and use allowances	33. Proposal costs
12. Donations and contributions	34. Publication and printing costs
13. Employee morale, health, and welfare costs	35. Rearrangement and altercation costs
14. Entertainment costs	36. Reconversion costs
15. Equipment and other capital expenditures	37. Rental costs of building and equipment
16. Fines and penalties	38. Royalties and other costs for the use of patents
17. Fund raising and investment management costs	39. Selling and marketing
18. Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs	40. Taxes
19. General government expenses	41. Termination costs applicable to sponsored agreements
20. Goods and services for personal use	42. Training costs
21. Idle facilities and idle capacity	43. Travel costs
22. Insurance and indemnification	

OMB Circular A-21, Part J provides cost principles that postsecondary institutions must apply when determining whether 54 specific costs are allowable. The institution must check all costs on a cost-by-cost basis against the requirements listed on page 16, as well as the requirements in the chart below to ensure the cost is allowable. **Not all specific costs listed in the following chart are allowable.**

The list in OMB Circular A-21, Part J includes the following (in alphabetical order):

1. Advertising and public relations costs	28. Lobbying
2. Advisory councils	29. LSOCTEs on other sponsored agreement or contracts
3. Alcoholic beverages	30. Maintenance and repair costs
4. Alumni/ae activities	31. Materials and supplies costs
5. Audit and related services	32. Meetings and conferences
6. Bad debts	33. Memberships, subscriptions, and professional activity costs
7. Bonding costs	34. Patent costs
8. Commencement and convocation costs	35. Plant and homeland security costs
9. Communication costs	36. Pre-agreement costs
10. Compensation for personal services	37. Professional service costs
11. Contingency provisions	38. Proposal costs
12. Deans of faculty and graduate schools	39. Publication and printing costs
13. Defense and prosecution of criminal and civil proceedings, claims, appeals, and patent infringement	40. Rearrangement and altercation costs
14. Depreciation and use allowances	41. Reconversion costs
15. Donations and contributions	42. Recruiting costs
16. Employee morale, health, and welfare costs	43. Rental costs of buildings and equipment
17. Entertainment costs	44. Royalties and other costs for the use of patents
18. Equipment and other capital expenditures	45. Scholarships and student aid costs
19. Fines and penalties	46. Selling and Marketing
20. Fund raising and investment management costs	47. Specialized service facility
21. Gains and losses on depreciable assets	48. Student activity costs
22. Goods and services for personal use	49. Taxes
23. Housing and personal living expenses	50. Termination costs applicable to sponsored agreements
24. Idle facilities and idle capacity	51. Training costs
25. Insurance and indemnification	52. Transportation
26. Interest	53. Travel costs
27. Labor relations costs	54. Trustees

**In determining whether costs are allowable, recipients must also consider whether or not a proposed expenditure violates Perkins supplement not supplant requirement. See Supplement not Supplant section for more information.**



## POTENTIALLY ALLOWABLE COSTS FOR CTE PROGRAM EXPENDITURES

1. Advisory councils
2. Audit costs and related services
3. Bonding costs
4. Communication costs
5. Depreciation and use allowances
6. Equipment and other capital expenditures
7. Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of Federal programs
8. Insurance and indemnification
9. Maintenance, operations, and repairs
10. Materials and supplies costs
11. Pre-award costs
12. Professional service costs
13. Proposal costs
14. Publication and printing costs
15. Rearrangement and alteration costs
16. Reconversion costs
17. Proposal costs
18. Publication and printing costs rearrangement and alteration costs
19. Reconversion costs
20. Rental costs of building and equipment
21. Royalties and other costs for the use of patents
22. Taxes
23. Training costs
24. Travel costs

## UNALLOWABLE COSTS

1. Any cost not allocable to the Perkins program
2. Any costs not necessary and reasonable
3. Alcoholic beverages
4. Bad debts
5. Contingency provisions (with limited exceptions)
6. Contributions/Donations
7. Entertainment
8. Fundraising and investment management costs (with limited exceptions)
9. Fines and penalties
10. General government expenses (with limited exceptions pertaining to Indian tribal governments and Councils of Government)
11. Goods or services for personal use
12. Interest and other financial costs
13. Lobbying
14. Selling and marketing costs (with limited exceptions)
15. Student internships
16. Use of funds for religion
17. Acquisition of real property (unless specifically permitted by programmatic statute or regulations)
18. Use of funds for construction (unless specifically permitted by programmatic statute or regulations)
19. Charging tuition or fees collected from students toward meeting matching, cost sharing, or maintenance of effort requirements of a program

## PERIOD OF AVAILABILITY OF FEDERAL FUNDS

All obligations must occur on or between the beginning and ending dates of the grant project. See EDGAR 34 C.F.R. Section 76.707. This period of time is known as the period of availability. Generally the period of availability of Perkins funds for recipients extends from July 1 to the following June 30. However, recipients may not begin to obligate grant funds until they have received notification from SOCTE that the Annual Report has been approved. See the Substantially Approvable Application section for more information. All obligations must be liquidated by September 30. Any funds not obligated by June 30 or liquidated by September 30 must be returned to SOCTE.

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# Supplement Not Supplant (Perkins Section 311)

As a requirement of the Perkins statute, funds made available under the Act must supplement and not supplant non-federal funds expended to carry out career and technical education activities. In other words, federal Perkins funds may only be used in addition to funds already spent by the state and recipients on CTE, and cannot be used in place of non-Perkins funds.

## **It will be presumed that supplanting has occurred where:**

- ▶ A recipient uses Perkins funds to provide services that the recipient is required to make available under another federal, state or local law;
- ▶ A recipient uses Perkins funds to provide services that the recipient provided with non-Perkins funds in the prior year; or
- ▶ A recipient provides services for non CTE students with non-federal funds, and provides the same services to CTE students using Perkins funds.

These presumptions are rebuttable if the recipient can demonstrate that it would not have provided the services in question with non-Perkins funds had the Perkins funds not been available.

In order to successfully rebut a supplanting presumption, the recipient must create and maintain contemporaneous written documents, such as meeting minutes or itemized budget documents for one year to the next, demonstrating that the decision to not fund an activity with state or local funds was made without regard to the availability of Perkins funds.

In no instance may a recipient decrease its state or local funding because the federal funds are available.

## **Innovative Examples to Leverage Perkins Funds:**

- ▶ Dual enrollment: funding college tuition for CTE high school students enrolled in college courses;
- ▶ Internships;
- ▶ College and Career Awareness Expos;
- ▶ Teacher Professional Development; or
- ▶ Academic Advising and Guidance Activities.

See Appendix for additional examples.

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# Accountability

## **State Reporting**

Perkins IV supports a State and local performance accountability system designed to assess the effectiveness of the State and local funding recipients in achieving progress in CTE secondary and postsecondary student performance on Perkins core indicators. Each State is required to report annually on the core indicators of performance that follow below and to develop performance measures for each indicator.

Data must be disaggregated for each indicator of performance by the subcategories of students described in the Elementary and Secondary Education Act (ESEA) and the categories of special populations identified in Perkins legislation. SOCTE will also request information from recipients for the State Longitudinal Education Database and various reports, including EDEN reporting, DC Council reports, Executive Office of the Mayor reports, and other reports to improve the quality, outcomes, and future projections of career and technical education in the District of Columbia.



## Local Reporting Requirements

Each recipient of Perkins funding must submit a report to the State each year regarding the progress the recipient has made in achieving its performance levels, including the performance of special populations. Recipients must submit disaggregated data for each indicator of performance by the subcategories of students described in the ESEA and the categories of special populations identified in Perkins.

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### STUDENT POPULATION DEFINITIONS

All eligible recipients should use the following student population definitions when reporting on performance levels:

- ▶ **CTE Adult Completer:** Students enrolled in a State-approved CTE Program of Study that is offered outside of traditional K-12 or degree-conferring postsecondary programs in secondary schools or postsecondary institutions. Students complete all courses in an approved CTE Program of Study.
- ▶ **CTE Adult Concentrator:** Students enrolled in a State-approved CTE Program of Study that is offered outside of traditional K-12 or degree-conferring postsecondary programs in secondary schools or postsecondary institutions. Students complete all courses except the final course or last 25% of clock hours in an approved CTE Program of Study.
- ▶ **CTE Adult Education Student:** Students enrolled in a State-approved CTE Program of Study that is offered outside of traditional K-12 or degree-conferring postsecondary programs in secondary schools or postsecondary institutions. The program may be taken as non-credit bearing courses for personal improvement/enrichment, or it may award a certificate of completion. The course of study does not lead to a diploma or degree, nor does it lead to technical certification.
- ▶ **CTE Adult Participant:** Students enrolled in a State-approved CTE Program of Study that is offered outside of traditional K-12 or degree-conferring postsecondary programs in secondary schools or postsecondary institutions. Students complete only one course and do not re-enroll for a second course in an approved CTE Program of Study.
- ▶ **CTE Postsecondary Completer:** Students enrolled in a State-approved CTE Program of Study in a postsecondary institution. The program leads to a diploma, associate, or bachelor degree. The student has completed all CTE courses in an approved CTE Program of Study.
- ▶ **CTE Postsecondary Concentrator:** Students enrolled in a State-approved CTE Program of Study in a postsecondary institution. The program leads to a diploma, associate, or bachelor degree. The student has completed 3 or more CTE courses or 75% of required clock hours in an approved CTE Program of Study.
- ▶ **CTE Postsecondary Participant:** Students enrolled in a State-approved CTE Program of Study in a postsecondary institution. The program leads to a diploma, associate, or bachelor degree. The student has completed less than 3 CTE courses in an approved CTE Program of Study.
- ▶ **CTE Postsecondary Student:** A student enrolled in a State-approved CTE Program of Study in a DC postsecondary institution.
- ▶ **CTE Secondary Completer:** A student who has completed a three- or four-course sequence in a State-approved CTE Program of Study.
- ▶ **CTE Secondary Concentrator:** A student who has completed two courses of a three-course sequence or three courses of a four-course sequence in a State-approved CTE Program of Study.
- ▶ **CTE Secondary Participant:** A student who has completed the first course and enrolled in the second course of a three- or four-course sequence in a State-approved CTE Program of Study.
- ▶ **CTE Secondary Student:** A student enrolled in a State-Approved CTE Program of Study in DC public or public charter high schools in grades 9-12.

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## SECONDARY CORE INDICATORS OF PERFORMANCE

- ▶ 1S1 Academic attainment in reading/language arts (as adopted by a State and measured by the State-determined proficient levels on the academic assessments under ESEA)
- ▶ 1S2 Academic attainment in math (as adopted by a State and measured by the State-determined proficient levels on the academic assessments under ESEA)
- ▶ 2S1 Technical skill attainment, including achievement on technical assessments aligned with industry-recognized standards, if available and appropriate
- ▶ 3S1 School Completion
- ▶ 4S1 Student graduation rates as described in the ESEA
- ▶ 5S1 Student placement in postsecondary education or advanced learning, in military service, or in employment
- ▶ 5S1 Student participation in CTE programs that lead to nontraditional career fields
- ▶ 6S2 Student completion of CTE programs that lead to nontraditional career fields

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## POSTSECONDARY CORE INDICATORS OF PERFORMANCE

- ▶ 1P1 Technical skill attainment, including achievement on technical assessments that are aligned with industry-recognized standards, if available and appropriate
- ▶ 2P1 Student completion of an industry-recognized credential, certificate, or degree
- ▶ 3P1 Student retention in postsecondary education or transfer to a baccalaureate degree program
- ▶ 4P1 Student placement in military service or apprenticeship programs or placement in high-skill, high-wage, or high-demand occupations or professions
- ▶ 5P1 Student participation in CTE programs that lead to nontraditional fields
- ▶ 5P2 Student completion of CTE programs that lead to nontraditional fields

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## ADULT CORE INDICATORS OF PERFORMANCE

- ▶ 1A1 Technical skill attainment, including achievement on technical assessments that are aligned with industry-recognized standards, if available and appropriate
- ▶ 2A1 Student completion of a non-credit credential, certificate, or degree
- ▶ 3A1 Student retention in adult education or transfer to an associate or baccalaureate degree program
- ▶ 4A1 Student placement in postsecondary or advanced learning, in military service or apprenticeship programs or placement in high-skill, high-wage, or high-demand occupations or professions
- ▶ 5A1 Student participation in CTE programs that lead to nontraditional fields
- ▶ 5A2 Student completion of CTE programs that lead to nontraditional fields

## Mechanics of Payment for Approved Expenditures

After the SOCTE has reviewed the expenditures reported in the Reimbursement Request, along with any requested supplemental documentation, payment is issued to recipients for allowable expenditures. There are two distinct payment procedures for approved reimbursements. For recipients who receive funds through an intra-district transfer according to a Memorandum of Understanding between SOCTE and the recipient, SOCTE will direct the recipient to initiate bill-back procedures for the approved portion of the reimbursement request. The recipient must then bill back SOCTE for the approved amount.

For all other recipients, SOCTE will provide reimbursement through an Automated Clearing House (ACH) payment whenever possible, and otherwise by issuing a check to the recipient at the address listed on the recipient's grant application.

Recipients are responsible for ensuring all costs charged to federal grants are allowable. If SOCTE determines at any time that a cost is unallowable, or was obligated outside the period of availability, SOCTE may disallow the cost. If a cost has been disallowed and the recipient has already received payment from SOCTE for the expenditure, the recipient may be required to repay funds to SOCTE.

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# Time Distribution

## Local Educational Agencies (OMB Circular A-87)

According to OMB Circular A-87 Attachment B (8)(h), all employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. This includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a federal program. This certification process is referred to as Time Distribution or Time and Effort documentation. There are two types of certification documents used, depending on whether an employee works on a single cost objective or multiple cost objectives.

A cost objective is defined as a function, organizational subdivision, contract, grant, or other cost activity for which cost data are needed and for which costs are incurred.

A Semiannual Certification is required of employees who spend 100% of their time working on a single cost objective. A monthly Personnel Activity Report (PAR) is required of employees who split their time working on multiple cost objectives. The reports must reflect an after-the-fact distribution of the actual activity of the employee, must account for the total activity for which the employee is compensated, must be prepared at least monthly. Each grant manager or a direct line supervisor who has firsthand knowledge of the work performed is responsible for certifying the employee’s time and effort documentation.

## INSTITUTIONS OF HIGHER EDUCATION (OMB CIRCULAR A-21)

Postsecondary recipients must comply with the requirements set out in OMB Circular A-21 Appendix A, Part J (1). Postsecondary employees must maintain after-the-fact activity reports. Professional/Professorial staff must keep records every 6 months. All other employees must keep monthly records. The after-the-fact activity reports must be signed by the employee, principal investigator, or a responsible official using suitable means of verification and the reports must reflect activity applicable to each sponsored agreement and to each category needed to identify facility and administration costs (indirect costs).

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# Inventory/Equipment

SOCTE and all recipients must ensure that fixed assets purchased with local or federal funds are properly capitalized, safeguarded, managed, and disposed of in accordance with District policies and in compliance with federal policies located in 34 C.F.R. § 80.31.

All fixed assets are subject to the inventory policies dictated below. Controllable property is subject to the same requirements, except that such property shall be excluded from depreciation calculations and financial reports. They shall, however, appear on other management information reports and fixed assets inventory records.

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## INVENTORY PROCEDURE

All fixed assets and controllable property must be inventoried.

All recipients must designate a staff member to act as a property control officer. Upon receipt and acceptance of a fixed asset or controllable property, the property control officer must supervise the addition of the property to the inventory system. This includes overseeing the tagging of all property and entry of all property into the FAS and agency fixed asset listing. The property control officer is also responsible for completing the physical inventory of all listed-property **at least annually** and approving any reconciliations and adjustments to the inventory records.

Pursuant to federal and local law, the following records must be maintained for all fixed assets and controllable property:

- ▶ Description of the property;
- ▶ A serial or other identification number;
- ▶ The source of the property;
- ▶ Who holds title;
- ▶ The acquisition date;
- ▶ The cost of the property;
  - Fixed assets and controllable property shall be initially recorded at the historical cost (the cash or cash equivalent price of obtaining the asset and bringing it to the location and condition necessary for its intended use). Donated assets shall be recorded at the fair market value at the date of acquisition.
- ▶ Percentage of Perkins participation in the cost of the property;
- ▶ The location;
- ▶ The use and condition of the property;
- ▶ The custodian of the property; and
  - Any person assigned a fixed asset (e.g., cell phone, laptop computer, etc.) for his or her direct official use shall be held responsible and liable for the fixed asset assigned to him or her. All fixed assets must be returned to SOCTE or the recipient when the official leaves the employment of the agency.
- ▶ Any ultimate disposition data including the date of disposal and sale price of the property.
  - Documents relating to the acquisition and disposal of fixed assets shall be retained throughout the life of the fixed asset and for a minimum of five years following the disposal of the fixed asset.

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## USES OF PROPERTY

Generally, SOCTE and all recipients must use property in the project in which it was acquired as long as it is needed. In other words, property purchased entirely with Perkins funds, must be used in the Perkins program. If the property is also used by another program, the cost of the property must be proportional to the benefit received by the program.

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## INVESTIGATION OF STOLEN OR LOST PROPERTY

If property is missing upon an inventory review or otherwise becomes lost or stolen, the recipient must investigate the circumstances that caused the property to be lost or stolen and must report it to the DC Office of the Inspector General, DC Auditor, DC Financial Officer, and Agency Fiscal Officer.

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## DISPOSAL OF PROPERTY

Once a program determines that property purchased with federal funds is no longer needed for the project or program for which it was purchased, SOCTE and all recipients should use the property for other federally-sponsored activities. If this is not possible or no other program can use the property, the property may be sold or otherwise disposed of. If the property's current value is \$5,000 or more, the recipient must pay back the federal share. If the current value of the property is less than \$5,000, there is no further obligation to the awarding agency.

Postsecondary recipients must request disposition instructions from the awarding agency if it can no longer use the property in question.

The recipient must record the final disposition information, including date of disposal and method used to determine current value where the recipient compensates the awarding agency for its share. Once disposed of, property must remain on the inventory list for five years.

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# Equitable Access and Participation Guidance (Perkins section 122; GEPA section 427)

The Carl D. Perkins Act of 1998 mandates that equal access and full participation in CTE programming be assured for members of special populations (as defined in Perkins section 3 (29)). All CTE programs are required to comply fully with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Individuals with Disabilities Education Act of 1975, and the Americans with Disabilities Act of 1990, as well as section 427 of the General Education Provisions Act (GEPA).

Discrimination in any form in employment or the provision of educational programs, services, and activities on the basis of actual or perceived race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, family status, family responsibilities, matriculation, political affiliation, disability, limited English proficiency, source of income, or place of residence or business is expressly prohibited by the D.C. Human Rights Act of 1977, as amended, D.C. Official Code, section 2-1401.01, et. seq.

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## Monitoring

SOCTE is responsible for monitoring grant recipients to ensure compliance with local and federal laws and regulations. (DC Code section 38-2601.01). Monitoring is the regular and systematic examination of all aspects associated with the administration and implementation of a State-approved program in an effort to ensure compliance and promote program quality.

### Desktop Monitoring

Desktop monitoring will occur at least once a year for each recipient. Recipients will be notified of the desktop monitoring at least four weeks in advance and will be informed of any pre-monitoring documentation they should prepare. During desktop monitoring, SOCTE performs an intensive review of documents submitted by the recipient or evidence that is otherwise available (e.g., policies and procedures available online). The State Office may also conduct a review of performance by examining performance data in the State-approved management information system. Desktop monitoring is a tiered monitoring approach that could be as specific as a request for documentation supporting a single reimbursement request or as expansive as a request for a series of quarterly reports or external audit. Desktop monitoring may include programmatic and/or fiscal monitoring.

No later than sixty days from the desktop review, the SOCTE review team will send written correspondence to the recipient providing an overview of any findings and corrective actions, if applicable. If applicable, recipients will have thirty-five days to develop a Corrective Action Plan that delineates strategies and a timeline for correcting any findings. SOCTE will be available to provide targeted technical assistance to ensure the plan is sufficient, manageable and timely. Post-monitoring may be conducted to ensure the plan has been sufficiently implemented. SOCTE will consider all findings resolved only after the recipient has provided sufficient evidence that the Corrective Action Plan has been fully implemented. Results of desktop monitoring will be considered by SOCTE when determining which recipients will receive onsite monitoring visits in the upcoming year.

## Onsite Monitoring

SOCTE will perform onsite monitoring visits of Perkins recipients based on the assessed risk of the recipient; however, all recipients will be monitored at least every three years. Risk-based factors include:

- ▶ Timeliness of reports (programmatic and fiscal);
- ▶ Issues related to reimbursement requests;
- ▶ Perkins staff turnover;
- ▶ Major increases in Perkins funding;
- ▶ Timing of prior Perkins on-site monitoring visit;
- ▶ Prior Perkins audit or monitoring findings; and
- ▶ Results of desktop monitoring.

## Pre-Visit

Recipients will be informed of impending monitoring visits at least four weeks in advance to enable them to prepare necessary documentation. They will also be given instruction and the Monitoring Instrument during a Monitoring Pre-Conference that will provide guidance and answer questions about the upcoming monitoring process. The Monitoring Instrument identifies performance indicators and the kinds of documents that can be used as evidence demonstrating compliance and progress or work accomplished on program improvement. Recipients are encouraged to evaluate the degree to which their systems for grant management are consistent and aligned with statutory and regulatory requirements. The collection and analysis of data and of fiscal and programmatic information indicate whether recipients are in need of closer evaluation and technical assistance.

## Monitoring Visit

During the onsite review, the review team may perform the following tasks:

- ▶ Review selected documentation (e.g., expense reports, local applications, programs of study, curriculum plans) relevant to the grant expenditures or program;
- ▶ Review student data/student records as they relate to the program area;
- ▶ Visit classrooms or service areas of the related program;
- ▶ Conduct focus group meetings with faculty, staff, students, parents, providers or other key stakeholders participating in or affected by the program; and
- ▶ Conduct additional monitoring activities as needed.

At the conclusion of the monitoring visit, the monitoring team will conduct an exit interview with key staff from the recipient to discuss preliminary findings.

## Types of Evidence

As part of the monitoring, recipients will be required to provide evidence of compliance. While it is impossible to provide an exhaustive list of all the documents that might be needed, commonly requested records may include the following:

- ▶ Payroll transactions (i.e., a list of employees paid with grant funds; job or position descriptions; time and effort records demonstrating employees worked on grant activities; time and attendance records demonstrating when an employee worked; evidence of payroll reconciliations; accounting records indicating how salaries were charged; and/or payment records indicating how salaries were paid);
- ▶ Procurement transactions (i.e., requisitions; cost estimates; requests for bids, proposals, etc.; copies of bids, proposals, etc. submitted; evaluation documents; purchase orders or contracts; invoices; proof that items purchased were received; and/or inventory records);
- ▶ Other expenditure receipts; or
- ▶ Records showing the recipient is meeting its obligations under the Education Department General Administrative Regulations (EDGAR) 76.730 (records related to grant funds) and/or the City-Wide Grants Manual and Sourcebook, including documents showing:



- The amount of funding available under the grant;
- How the grant recipient used the funds;
- The total cost of the program;
- The share of that total cost provided from other sources; and
- Other records to facilitate an effective audit.

## Monitoring Reports and Resolution

As soon as possible but no later than 60 days after the conclusion of the monitoring visit, SOCTE will send written correspondence to the recipient. The correspondence will provide an overview of any findings, recommendations, and corrective actions. If applicable, recipients will have thirty-five days to develop a Corrective Action Plan that delineates strategies and a timeline for correcting any findings. SOCTE will be available to provide targeted technical assistance to ensure the plan is sufficient, manageable and timely.

Post-monitoring visits may be conducted to ensure the plan has been sufficiently implemented. SOCTE will consider all findings resolved only after the recipient has provided sufficient evidence that the Corrective Action Plan has been fully implemented. At such point, a closeout letter will be issued to indicate that all findings have been resolved and to document which conditions or restrictions have been lifted.

## Conditions/Restrictions

A recipient's failure to sufficiently implement its Improvement Plan within the determined timeframe may lead to special conditions or restrictions on the recipient's ability to receive grant funds in the future. Special conditions or restrictions may include:

- ▶ Additional reporting;
- ▶ Additional onsite monitoring;
- ▶ Mandatory technical assistance; and/or
- ▶ Withholding or suspension of grant funds, with appropriate written notification.

# Definitions

**Administration:** The term 'administration,' when used with respect to an eligible agency or recipient, means activities necessary for the proper and efficient performance of the eligible agency or eligible recipient's duties under this Act, including the supervision of such activities. Such term does not include curriculum development activities, personnel development, or research activities.

**Career and Technical Education (Perkins Section 3):** The term "career and technical education" means organized educational activities that:

- ▶ Offer a sequence of courses that:
  - Provides individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions;
  - Provides technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree; and
  - May include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph.
- ▶ Include competency-based applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual.

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**Controllable Property:** controllable property is tangible, personal property with a useful life of more than one year and an acquisition cost of less than \$5000. Controllable property is typically considered valuable and/or sensitive with a high risk of theft. Controllable property may include, but is not limited to cell phones, iPads, printers, digital cameras, laptops, VCRs, power tools, etc. **Computer equipment, such as a CPU, disk drive, keyboard cables, etc. purchased as a unit must be listed and priced as a system. Such purchases may not be listed by individual component.**

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**Eligible Recipient (Perkins Section 3):** The term 'eligible recipient' means:

- ▶ A local educational agency (including a public charter school that operates as a local educational agency), an area CTE school, an educational service agency, or a consortium, eligible to receive assistance under section 131; or
  - ▶ An eligible institution or consortium of institutions eligible to receive assistance under section 132.
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**Fixed assets:** fixed assets are tangible, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Fixed assets may include, but are not limited to furniture, vehicles, copiers, and other pieces of equipment.

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**Programs of Study (Perkins Section 122):** Each local recipient of Perkins funds must offer **at least one** CTE program of study that:

- ▶ Incorporates secondary education and postsecondary education elements;
  - ▶ Includes coherent and rigorous content aligned with challenging academic standards and relevant career and technical content in a coordinated, non-duplicative progression of courses that align secondary education with postsecondary education to adequately prepare students to succeed in postsecondary education;
  - ▶ May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits; and/or
  - ▶ Leads to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree.
- 

**Special Populations (Perkins Section 3):** The term 'special populations' means:

- ▶ Individuals with disabilities;
  - ▶ Individuals from economically disadvantaged families, including foster children;
  - ▶ Individuals preparing for nontraditional fields;
  - ▶ Single parents, including single pregnant women;
  - ▶ Displaced homemakers; and
  - ▶ Individuals with limited English proficiency.
- 

**Supplies:** All property not considered fixed assets or controllable property are supplies. Supplies may include, but are not limited to paper, pens, staples, etc.

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## Student Population Definitions

All eligible recipients should use the following student population definitions when reporting on performance levels:

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**CTE Secondary Student:** A student enrolled in a State-Approved CTE Program of Study in DC public or public charter high schools in grades 9-12.

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**CTE Postsecondary Student:** A student enrolled in a State-approved CTE Program of Study in a DC postsecondary institution.

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**CTE Adult Education Student:** Students enrolled in a State-approved CTE Program of Study that is offered outside of traditional K-12 or degree-conferring postsecondary programs in secondary schools or postsecondary institutions. The program may be taken as non-credit bearing courses for personal improvement/enrichment, or it may award a certificate of completion. The course of study does not lead to a diploma or degree, nor does it lead to technical certification.

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**CTE Secondary Participant:** A student who has completed the first course and enrolled in the second course of a three- or four-course sequence in a State-approved CTE Program of Study.



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## **PART IV**

### **Appendix**

# Examples of Coordinated Use of Federal Funds

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# Important Note

The examples on the following pages (and throughout this document, where applicable) are provided only to illustrate how ED funds can be coordinated. OSSE is not mandating any particular strategy, or endorsing one strategy over another.

These examples focus on school-level strategies, i.e. activities that will take place within an individual school. This makes sense because the majority of DC's LEAs operate as single schools. Coordinating "district-level spending," in other words spending federal funds at the central level to support multiple schools, is permissible as long as certain restrictions are followed.

These examples also presume that for Title I purposes the school is operating a schoolwide program. Which students/staff may participate in, or benefit from, a Title I funded activity depends on whether the school operates a targeted assistance program or schoolwide program. Please contact the Office of Grants Management and Compliance for more information. For more information about using Title I to support comprehensive strategies in a targeted assistance setting, please see Section I of this document.

Last, schools and LEAs are encouraged to carefully review the entire document, particularly the sections on supplement not supplant and time and effort, for important information about rules that affect coordinated spending. Supplement not supplant rules in particular can be very tricky. Since supplement not supplant is so fact-specific, schools and LEAs must look at the bigger picture of what is going on in the school or district when deciding if a cost can be supported with ED funds, even in a schoolwide program school.

# Examples of Coordinated Use of Federal Funds

Effective Staffing Practices and Professional Development	Title I, Part A District Level and Targeted Assistance Programs	Title I, Part A Schoolwide Programs	Title II, Part A Improving Teacher Quality	Title III, Part A-LE	Carl D. Perkins	IDEA Consolidated (611 & 619)
<b>Salaries and Benefits</b>						
Stipends to eligible staff for supplemental professional development on college and career ready standards to support eligible students	✓	✓	✓	✓	✓	✓
Stipends to eligible teachers for supplemental professional development aligned with a teacher's identified needs based on staff evaluation, classroom observations (including peer observation) and student performance to build specific skills and knowledge of teachers to support eligible students	✓	✓	✓	✓	✓	✓
Stipends to eligible staff for supplemental professional development on the effective integration of college and career ready academics with career and technical education to support eligible students	✓	✓	✓		✓	✓
Salary of instructional coaches, mentors, or specialists to provide supplemental job-embedded supports for eligible teachers	✓	✓	✓	✓	✓	✓
Substitute teachers to release classroom teachers to participate in supplemental professional development relevant to the support of eligible students	✓	✓	✓	✓	✓	✓
<b>Supplies and Materials</b>						
Supplemental materials and supplies to support eligible professional development activities	✓	✓	✓	✓	✓	✓
<b>Contracted Services</b>						
Contracted services to provide supplemental professional development on college and career ready standards for eligible staff	✓	✓	✓	✓	✓	✓
Consultants to provide supplemental professional development aligned with identified teacher needs	✓	✓	✓	✓	✓	✓
Contracted services to support supplemental job-embedded professional development on appropriate instructional strategies and interventions for eligible students	✓	✓	✓	✓	✓	✓
<b>Other</b>						
Reasonable travel and registration for supplemental professional development to eligible staff relevant to the support of eligible students	✓	✓	✓	✓	✓	✓

**Check marked activities may not be allowable for all LEAs. Please reach out to your ConApp, IDEA, or Perkins point of contact to learn about how to use your federal programs to support your initiatives.**

# Examples of Coordinated Use of Federal Funds

Effective Use of Data	Title I, Part A District Level and Targeted Assistance Programs	Title I, Part A Schoolwide Programs	Title II, Part A Improving Teacher Quality	Title III, Part A-LE	Carl D. Perkins	IDEA Consolidated (611 & 619)
<b>Salaries and Benefits</b>						
Stipends for supplemental professional development to eligible staff on the effective use of data to support improved improved instruction for eligible students.	✓	✓	✓	✓	✓	✓
Stipends for professional development on a comprehensive drop-out prevention plan based on student data.		✓	✓			
Salaries or stipends for coaches to provide supplemental supports to eligible teachers in effectively using data and delivering improved instruction based on student needs.	✓	✓	✓	✓	✓	✓
Salary of instructional coaches, mentors, or specialists to provide supplemental job-embedded supports for eligible teachers.	✓	✓	✓	✓	✓	✓
Stipends or other salary costs to provide eligible teachers time to review data to support improved outcomes for eligible students.	✓	✓		✓	✓	✓
<b>Supplies and Materials</b>						
Supplemental materials and supplies related to drop-out prevention program based on eligible student data.	✓	✓				✓
Supplemental materials and supplies related to professional development on data-driven instruction for eligible students.	✓	✓	✓	✓	✓	✓
<b>Contracted Professional Services</b>						
Contracted professional services from data experts to work with eligible schools to analyze data for eligible students to improve instruction and identify appropriate interventions.	✓	✓		✓	✓	✓
Consultants to provide supplemental professional development related to the effective use of data for improved instruction.	✓	✓	✓	✓	✓	✓
<b>Other</b>						
Reasonable travel and registration cost related to professional development on the effective use of data to support eligible students.	✓	✓	✓	✓	✓	✓

**Check marked activities may not be allowable for all LEAs. Please reach out to your ConApp, IDEA, or Perkins point of contact to learn about how to use your federal programs to support your initiatives.**

# Examples of Coordinated Use of Federal Funds

Rigorous Curriculum and Instruction	Title I, Part A District Level and Targeted Assistance Programs	Title I, Part A Schoolwide Programs	Title II, Part A Improving Teacher Quality	Title III, Part A-LE	Carl D. Perkins	IDEA Consolidated (611 & 619)
Salaries and Benefits						
Stipends to eligible teachers for supplemental professional development on instructional approaches and curricula designed to address needs of eligible students	✓	✓	✓	✓	✓	✓
Stipends to teachers to support aligning instruction across grades throughout a school and responsive to student needs		✓				
Supplies and Materials						
Supplemental instructional materials to address the needs of eligible students	✓	✓		✓	✓	✓
Contracted Professional Services						
Supplemental contracted services to support instructional methods relevant to eligible students	✓	✓			✓	✓
Consultants to support ongoing job-embedded professional development on aligning instruction throughout a school and responsive to student needs		✓	✓			
Other						
Reasonable travel and registration cost for supplemental professional development to eligible staff	✓	✓	✓	✓	✓	✓

Check marked activities may not be allowable for all LEAs. Please reach out to your ConApp, IDEA, or Perkins point of contact to learn about how to use your federal programs to support your initiatives.

# Examples of Coordinated Use of Federal Funds

School Climate and Culture	Title I, Part A District Level and Targeted Assistance Programs	Title I, Part A Schoolwide Programs	Title II, Part A Improving Teacher Quality	Title III, Part A-LE	Carl D. Perkins	IDEA Consolidated (611 & 619)
<b>Salaries and Benefits</b>						
Stipends to teachers for supplemental professional development on behavior management strategies for eligible students.	✓	✓	✓			✓
Stipends to eligible staff for supplemental professional development on using data to identify struggling students eligible for services, and provide early and appropriate interventions to such students.	✓	✓	✓	✓		✓
Stipends to eligible staff for supplemental professional development activities related to improving classroom practice and learning for eligible students.	✓	✓	✓	✓	✓	✓
Stipends to staff for professional development on addressing bullying, harrassment or social isolation.		✓	✓			
Salary of personnel to monitor and address attendance issues that impact student performance.		✓				
Stipends to staff to support enrichment activities that help students stay engaged in school.		✓				
Stipends to staff to support a peer mediation program.		✓				
Stipends to staff to support a student advisory system.		✓				
<b>Supplies and Materials</b>						
Materials and supplies that support implementation of schoolwide behavioral management plan.		✓				✓
Materials and supplies to support a peer mediation program.		✓				
Materials and supplies to support a peer tutoring program.		✓				
<b>Contracted Professional Services</b>						
Contracted Professional Services provided to support implementation of schoolwide behavioral management plan.		✓				✓
Consultants to provide supplemental professional development aligned with identified teacher needs.	✓	✓	✓	✓	✓	✓
<b>Other</b>						
Reasonable travel and registration related to positive behavioral supports.		✓				✓
Reasonable attendance incentives.		✓				
Safety equipment or related costs to improve the school environment to improve educational outcomes.		✓				

**Check marked activities may not be allowable for all LEAs. Please reach out to your ConApp, IDEA, or Perkins point of contact to learn about how to use your federal programs to support your initiatives.**



# Examples of Coordinated Use of Federal Funds

Effective Family and Community Engagement	Title I, Part A District Level and Targeted Assistance Programs	Title I, Part A Schoolwide Programs	Title II, Part A Improving Teacher Quality	Title III, Part A-LE	Carl D. Perkins	IDEA Consolidated (611 & 619)
<b>Salaries and Benefits</b>						
Stipend for school-level Parent/Family Coordinator to the extent activities are relevant to the contributing federal program.	✓	✓		✓	✓	✓
Stipends for staff to provide child-care for parents/guardians of eligible students during parent engagement programs.	✓	✓		✓		
<b>Supplies and Materials</b>						
Materials and supplies that support post-secondary transition and career assessment for eligible students.	✓	✓			✓	✓
Materials and supplies that relate to parents of eligible students helping students learn at homes.		✓		✓	✓	✓
<b>Contracted Professional Services</b>						
Contracted Professional Services related to implementing community based partnerships to address needs of eligible students outside of school.	✓	✓		✓	✓	✓
<b>Other</b>						
Reasonable registration and travel related to supplemental professional development on family and community engagement relevant to the contributing federal program.	✓	✓	✓	✓	✓	✓

**Check marked activities may not be allowable for all LEAs. Please reach out to your ConApp, IDEA, or Perkins point of contact to learn about how to use your federal programs to support your initiatives.**

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# EXAMPLE 1

## **Intensive professional development on college and career ready standards, particularly to support struggling students**

### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Professional development activities for school staff on appropriate instructional strategies for struggling students, including job-embedded professional development (under certain circumstances this can include reasonable related costs such as stipends, substitute teachers, etc.).
- ▶ Title II, Part A
  - Professional development for teachers and principals, and in certain circumstances paraprofessionals, on instructional practices that address the needs of students.
- ▶ Title III, Part A
  - Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.
- ▶ IDEA, Part B, Section 611
  - Professional development for teachers of students with disabilities (including special educators and general educators that serve students with disabilities) on appropriate instructional strategies for such students, including job-embedded professional development (this can include related costs such as stipends, substitute teachers, etc.).
  - Professional development for educators responsible for helping children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services (CEIS) set-aside.
- ▶ Perkins
  - Professional development for career and technical education teachers on integrating college and career ready standards into the CTE curriculum.

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## EXAMPLE 2

### **Intensive professional development aligned with identified teacher needs based on staff evaluation, classroom observations (including peer observations) and student performance to build specific skills and knowledge of teachers**

#### POSSIBLE ED FUNDING SOURCES:

##### Title I, Part A

- Salary costs of professional development specialist/coordinator;
- Hiring outside data experts;
- Hiring outside partners to support teachers; and/or
- Job-embedded professional development costs.

##### ► Title II, Part A

- Salary costs of professional development specialist if the specialist is a mentor teacher or exemplary teacher and the position is part of an teacher advancement initiative or merit pay program to retain excellent teachers and to ensure they teach in highest need schools.

##### ► Title III, Part A

- Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.

##### ► IDEA, Part B Section 611 (for teachers who serve students ages 3-21) or Section 619 (for teachers who serve students ages 3-5):

- Professional development for teachers of students with disabilities (including special educators and general educators that serve students with disabilities), including job-embedded professional development (this can include related costs such as stipends, substitute teachers, etc.);
- Professional development for educators responsible for helping children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services set-aside;
- Dual certification costs to improve outcomes for students with disabilities;
- Teacher mentoring programs for teachers of students with disabilities;
- Induction programs for new teachers of students with disabilities;

##### ► Perkins

- Professional development for CTE teachers and other school personnel who are involved in the direct delivery of educational services on instructional or industry practices relevant to the CTE program.

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## EXAMPLE 3

### **Instructional coaches, specialists, or other core content supports to provide job-embedded supports for teachers**

#### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Instructional coaches to assist teachers in delivering improved classroom instruction.
  - Job-embedded professional development.
  
- ▶ Title II, Part A
  - Professional development for teachers in content knowledge and classroom strategies.
  - Professional development activities involving collaborative groups of teachers and administrators.
  - Professional development activities that provide training in improving student behavior in the classroom and identifying early and appropriate interventions to help students with special needs.
  - Training on how to use data and assessments to improve classroom practice and student learning.
  
- ▶ Title III, Part A
  - Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.
  
- ▶ IDEA, Part B, Section 611 (for teachers who serve students ages 3-21) or Section 619 (for teachers who serve students ages 3-5)
  - Instructional coaches to assist teachers in delivering improved classroom instruction for students with disabilities.
  - Teacher mentors, including stipends for teachers who serve as mentors, substitute teachers to provide release time for mentors, and training mentors in adult development and learning/communication skills to provide effective mentoring.
  - Job embedded professional development for teachers of students with disabilities (can include special educators and general educators that serve students with disabilities).
  - Job embedded professional development for educators responsible for helping children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services set-aside.
  
- ▶ Perkins
  - Job-embedded professional development for CTE teachers and other school personnel who are involved in the direct delivery of educational services on instructional or industry practices relevant to the CTE program.
  - Internships that provide relevant business experience for CTE teachers or other school personnel who are involved in the direct delivery of educational services to CTE students.

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## EXAMPLE 4

### Instructional approaches and curricula designed to explicitly address the needs of struggling students (i.e. low literacy, numeracy, etc.)

#### POSSIBLE ED FUNDING SOURCES:

##### Title I, Part A

- Instructional materials to assist with explicit instruction addressing specific needs of low-achieving students (low literacy, low numeracy, etc.).
- Professional development in explicit instructional methods (which under certain circumstances can include reasonable related costs such as stipends, substitute teachers, etc.).
- Job embedded professional development in explicit instruction methods.

##### ► Title II, Part A

- Professional development activities in explicit instructional methods – both content and/or classroom practices.

##### ► Title III, Part A

- Supplemental explicit instructional programs for English language learners designed to improve the English proficiency and academic achievement of English language learners.

##### ► IDEA, Part B Part B Section 611 (for students ages 3-21), or Section 619 (for students ages 3-5)

- Purchasing curricula, instructional materials, or assessments that utilize universal design for learning approaches to address the needs of students with disabilities in inclusive settings (depending on the specific items purchased, IDEA may be able to support only part of the overall cost).
- Planning and implementing new learning environments supportive of all learners within in an inclusive settings (depending on the specific items/services purchased, IDEA may be able to support only part of the overall cost).
- Professional development on using specialized formats to support students with disabilities in the least restrictive environment.
- Interventions for students with disabilities struggling to master academic content or behavioral skills such as literacy interventions, math interventions, or behavior interventions (could include purchasing reading or math programs, employing literacy or math coaches, or positive behavioral supports).
- Interventions for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done **as part of the coordinated early intervening services set-aside.**

##### ► Perkins

- Professional development for CTE teachers and other school personnel who are involved in the direct delivery of educational services on integrating academic supports into CTE programs for CTE students that struggle to master relevant academic content.
- Upgrading CTE curricula to incorporate academic supports to help CTE students master challenging academic standards.

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## EXAMPLE 5

### **Aligning instruction across grades throughout the school and responsive to student needs**

#### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Extended time for teachers to review data and identify interventions that are responsive to student needs/ meet the needs of struggling students.
  - Hiring outside data experts to assist with identification of alignment gaps.
  - Piloting data system/implementing supplemental school-level data system.
  - Instructional coaches to assist teachers in delivering improved classroom instruction.
  - Job embedded professional development.
- ▶ Title II, Part A
  - Professional development activities involving collaborative groups of teachers and administrators.
  - Training on how to use data and assessments to improve classroom practice and student learning.
  - Salary costs of instructional specialist if the specialist is a mentor teacher or exemplary teacher and the position is part of an teacher advancement initiative or merit pay program to retain excellent teachers and to ensure they teach in highest need schools.
- ▶ Title III, Part A
  - Implementing supplemental programs for English language learners designed to improve the English proficiency and academic achievement of English language learners.
- ▶ IDEA, Part B, Section 611 (for teachers who serve students ages 3-21) or Section 619 (for teachers who serve students ages 3-5)
  - Integrating supports for students with disabilities into general education settings through universal design for learning or other strategies to create learning environments inclusive of all learners (depending on the specific items/services purchased, IDEA may be able to support only part of the overall cost).
  - Merge data from separate systems (i.e. early education, special education, elementary and secondary, post-secondary, workforce) to identify and support students with disabilities.
- ▶ Perkins
  - Aligning CTE programs with college and career ready academic standards.
  - Linking secondary and post-secondary CTE programs.

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## EXAMPLE 6

### Data coaches to assist with the effective use of data to support improved student learning

#### POSSIBLE ED FUNDING SOURCES:

##### Title I, Part A

- Data/instructional coaches to assist teachers in effectively using data and delivering improved classroom instruction based on student need.
- Extended time for teachers to review data and identify interventions that can better meet the needs of struggling students.
- Job embedded professional development.

##### ► Title II, Part A

- Salary costs of instructional specialist if the specialist is a mentor teacher or exemplary teacher and the position is part of an teacher advancement initiative or merit pay program to retain excellent teachers and to ensure they teach in highest need schools.
- Professional development activities involving collaborative groups of teachers and administrators.
- Professional development on effective data use to improve classroom practice and student learning.

##### ► Title III, Part A

- Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.

##### ► IDEA, Part B Part B Section 611 (for students ages 3-21), or Section 619 (for students ages 3-5)

- Data/instructional coaches to assist teachers in effectively using data and delivering improved classroom instruction for students with disabilities based on student need.
- Extended time for teachers to review data and identify interventions that can better meet the needs of students with disabilities.
- Job-embedded professional development for teachers of students with disabilities (with can include special educators or general educators that serve students with disabilities).
- Coaching, extended time to review data, or professional development to improve instruction for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services set-aside.
- Develop and utilize early childhood data systems to improve outcomes for students with disabilities.

##### ► Perkins

- Professional development for CTE and other school personnel who are involved in the direct delivery of educational services on effective use of data to improve instruction.

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## EXAMPLE 7

### **A comprehensive drop-out prevention program based on data for students most at risk of dropping out**

#### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - School climate interventions, including interventions such as: attendance incentive programs, student support systems that connect small groups of students with adults, and service learning and peer tutoring.
  - Credit recovery programs and/or coursework to prepare students for advanced coursework.
  - Extended school day, week, or year programs to support students at risk of dropping out.
  - Piloting data system/implementing supplemental school-level data system.
- ▶ Title II, Part A
  - Professional development activities for teachers relevant to drop-out prevention and other early intervention strategies for struggling students.
- ▶ Title III, Part A
  - Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.
- ▶ IDEA, Part B, Section 611
  - Academic interventions for at-risk students with disabilities.
  - Positive behavioral supports, and other school climate initiatives to address the needs of students with disabilities.
  - Secondary transition services for students with disabilities.
  - Academic and behavioral supports for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services set-aside.
  - Merge data from separate systems (i.e. early education, special education, elementary and secondary, post-secondary, workforce) to identify and support students with disabilities.
- ▶ Perkins
  - Integrate academic supports for CTE students into CTE programs.
  - Develop and support small, personalized career-themed learning communities.
  - Provide CTE programs to students who have dropped out to complete high school.
  - Services to prepare special populations enrolled in CTE programs for high-skill, high-wage, or high-demand occupations that will lead to self sufficiency.



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# EXAMPLE 8

## Implement a schoolwide behavior management plan

### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Extended time for teachers to review student data and identify interventions that can better meet the needs of students whose behavior struggles are interfering with academic progress.
  - Hiring outside data experts.
  - Instructional coaches to assist teachers in delivering improved classroom management practices.
  - Job embedded professional development.
- ▶ Title II, Part A
  - Professional development for teachers in content knowledge and classroom strategies.
  - Professional development activities involving collaborative groups of teachers and administrators.
  - Professional development activities that provide training in improving student behavior in the classroom and identifying early and appropriate interventions to help students with special needs.
  - Training on how to use data and assessments to improve classroom practice and student learning.
- ▶ Title III, Part A
  - Supplemental explicit instructional programs for English language learners designed to improve the English proficiency and academic achievement of English language learners.
- ▶ IDEA, Part B Part B Section 611\*
  - Technical assistance and professional development for teachers, service providers, and school staff for training needed to implement a schoolwide behavior intervention.
  - Employment and training for behavior coaches who would support the implementation of a schoolwide behavior program, and train additional staff coaches to sustain the program.
  - A schoolwide data system that measures school climate in a rigorous way so that progress can be assessed and measured.

\*IDEA could not support the entire cost of a schoolwide behavior management program that serves all students. It could, however, pay for part of the cost. Please see Section B-5 here: <http://www2.ed.gov/policy/gen/leg/recovery/guidance/idea-b-reform.pdf> for more information about how to coordinate IDEA with other funding sources to implement schoolwide behavior interventions.

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## EXAMPLE 9

### **Implement community based partnerships to address student needs outside of school (wraparound services, medical needs, etc.)**

#### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Salary costs to hire a coordinator in a community school model where the coordinator facilitates the delivery of health, nutrition, and social services to the school's students in partnership with local service providers.
  - Professional development in a community school model necessary to assist teachers, pupil services personnel, other staff, and parents in identifying and meeting the comprehensive needs of students.
- ▶ Title II, Part A
  - Professional development to enable teachers to identify needs of students (using data, observation, etc.) so early interventions can be deployed.
- ▶ Title III, Part A
  - Supplemental professional development to classroom teachers, principals, administrators, and other school and community-based organizational personnel to support English language learners.
- ▶ IDEA, Part B, Section 611 (for teachers who serve students ages 3-21) or Section 619 (for teachers who serve students ages 3-5)
  - Specific special education and related services required by a student's IEP, which may include medical devices and services consistent with IDEA rules.
  - Collaboration with early education providers to support the social and emotional development of young children.

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# EXAMPLE 10

## Implement community based out-of-school opportunities for students (internships, career shadow days)

### POSSIBLE ED FUNDING SOURCES:

- ▶ Title I, Part A
  - Salary cost of community engagement specialist.
  - Extended learning time of school day, week, or year.
  - Before- and after-school programs.
  - Saturday school and summer school.
- ▶ Title II, Part A
  - Salary costs of extended learning time/community engagement specialist if the specialist is a mentor teacher or exemplary teacher and the position is part of an teacher advancement initiative or merit pay program to retain excellent teachers and to ensure they teach in highest need schools.
- ▶ IDEA, Part B Part B Section 611
  - Hiring transition personnel who possess the knowledge and skills to work with teachers, businesses, employers, community colleges, technical schools, and institutions of higher education to create an effective integration system for students with disabilities.
  - Purchasing transition-curriculum and career assessment, exploration and development tools for students with disabilities.
  - Providing technical assistance and professional development to enhance the knowledge and skills of special educators regarding transition strategies.
  - Integrating data on transition services for students with disabilities into other education data systems to support student outcomes.
- ▶ Perkins
  - Collaborating with technology industries to offer voluntary internships and mentoring programs that improve the math and science knowledge of students.
  - Professional development for CTE and other school personnel who are involved in the direct delivery of educational services to stay current on all aspects of an industry, which may include internship programs for teachers that provide relevant business experience.
  - Work-related experiences for CTE students, such as internships, cooperative education, school-based enterprises, entrepreneurship, and job shadowing, that are related to CTE programs.
  - Continuing job training and assistance finding a job to former CTE students through the one-stop system.
  - Job training, including mentoring, for non-traditional fields.
  - Training programs in automotive fields.

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